Planning Statement

Caversham Park, Reading, RG4 8TZ

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1. Introduction

1.1. This Planning Statement has been prepared by Savills on behalf of Beechcroft Developments Ltd, hereafter referred to as 'the Applicant'. It is submitted in support of a full planning application and listed building consent to Reading Borough Council (RBC) at Caversham Park, Peppard Road, Caversham, (the Site) for the following development:

'Redevelopment of *Caversham Park for:*

- ***64 assisted living units (Class C2) for the over 55's through the conversion of Caversham Park House;***
- ***64 bed care home (Class C2);***
- ***61 age restricted retirement dwellings (Class C3)***
- ***5 market dwellings (Class C3);***
- ***28 affordable dwellings (Class C3); and***
- ***refurbishment and extension of the existing pavilion to provide enhanced changing facilities, café/studio and sports provision comprising 2 no. croquet lawns, 2 no. bowling greens, an additional tennis court, refurbishment of the existing tennis court and associated parking and landscaping following the demolition of unsympathetic extensions and associated outbuildings to the main house and removal of twentieth century satellite dishes and associated infrastructure'.***

1.2. The proposed development will provide a Care Home, Assisted Living Units, retirement housing for people aged over 55, market dwellings and affordable housing.

1.3. Beechcroft Developments has become one of the UK's leading retirement developers, building high quality homes for the over 55s in some of the most attractive towns and villages in Surrey, Sussex, Hampshire, Hertfordshire, Berkshire, Oxfordshire, Wiltshire, Middlesex, Gloucestershire and Kent.

1.4. The Site is approximately 37.7ha in area and is shown edged in red on the plan at Appendix 1. The Site forms part of what was a historic country estate in Caversham with extensive grounds located to the north of Reading town centre and to the north of the River Thames and surrounded by suburban development. The majority of the Site is a registered Historic Park and Garden (Grade II) and the main House itself, Caversham Park House, is Grade II Listed, along with a number of ancillary structures in the Site.

1.5. Caversham Park House was extensively rebuilt in 1850 with a number of ancillary structures within the grounds, all of which are encompassed by Caversham Park. The origins on the Site date back to at least Norman times, with the estate featuring in the Domesday Book. The Site is a Registered Historic Park and Gardens and Caversham Park House, which dates from the Victorian era, is Grade II Listed, along with many other buildings and structures in the Site. The house and its grounds have been used by the BBC as its Monitoring Station since 1943 for broadcasting services and other related actively, which falls within an office use (Class E) as demonstrated by the planning history. Over recent years, the BBC have begun winding down their operations at Caversham Park.

1.6. In agreement with the BBC, the applicant is proposing a development to provide Assisted Living Units and a Care Home as well as new open market housing for the over 55's and affordable homes. The application is submitted within the context that there is an ageing population which will become a priority in the next ten years and subsequently there is a need for speciality residential housing in Reading, which is identified in the Reading Local Plan, in addition to the national requirement for housing. The Reading Local Plan acknowledges that the number of people in Reading aged 65 and over is expected to increase by more than 60% to 2036. These proposals will help to meet Reading Borough Council's (RBC) requirements for providing residential care bedspaces for elderly people in addition to the national housing need.

1.7. The Site is located within the northern suburbs of Reading and close to Emmer Green and Caversham which have a range of amenities and facilities. The Site is adjoined by suburban twentieth century residential properties and is bordered to the west by Peppard Road and Lowfield Road, which the latter also adjoins the northern and eastern boundaries of the Site. To the south of the Site is Reading Cemetery and Crematorium.

1.8. The proposed development would place the Site into a viable residential use, which is its original use. The proposed development would ensure the estate's future, by providing for ongoing investment and maintenance.

1.9. The proposed development will also provide a net benefit with regard to the listed buildings and their significance including repairing and refurbishing the buildings and bringing them back into an optimal condition, as well as securing their future. The proposed development will also significantly improve the condition of the wider estate, by removing later additions which detract from Caversham Park House and the registered park and garden and will bring about a number of measures which would help to better reveal and enhance the significance of the listed buildings and improve their setting.

The Planning Application Submission

1.10. This Statement draws upon the findings of various technical information and should be read in conjunction with the accompanying application material to provide a comprehensive understanding of the proposal and its associated benefits.

1.11. In addition to this Planning Statement, the following documentation is submitted with the planning application:

- **Design and Access Statement** prepared by BHP Harwood Architects;
- **Environmental Statement** prepared by Savills
- **Heritage Assessment** prepared by the Heritage & Townscape Team at Savills;
- **Transport Statement** prepared by Glanville Consultants;
- **Framework Travel Plan** prepared by Glanville Consultants;
- **Construction Traffic Management Plan** prepared by Glanville Consultants;
- **Foul Drainage & Utilities Assessment** prepared by Glanville Consultants;
- **Landscape & Visual Appraisal** prepared by Savills;
- **Ecological Appraisal** prepared by Aspect Ecology;
- **Arboricultural Impact Assessment** prepared by Aspect Arboriculture;
- **Flood Risk Assessment** prepared by Glanville Consultants;
- **Archaeology Desk Based Assessment** prepared by Thames Valley Archaeological Services;
- **Desk Study Report** prepared by ST Consult Environmental & Geotechnical;
- **Planning Support Statement** – **Broadband Utilities** prepared by MJA consulting;
- **Statement of Community Involvement** prepared by Savills;
- **Air Quality Assessment** prepared by Aether Ltd;
- **Lighting Strategy** prepared by Design for Lighting;
- **BREEAM Pre-Assessment** prepared by Greenbuild Consult;
- **Housing Need's Assessment** prepared by Three Dragons; and
- **Energy Strategy and Sustainability Statement** prepared by Resi Resolve Sustainability.

Environmental Impact Assessment

1.12. A request for a Screening Opinion was submitted to Reading Borough Council (RBC) on 21 December 2021 in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. RBC issued their Screening Opinion on 26 January 2022 which states that they consider the proposal to be 'EIA development'. A copy of the LPA's screening opinion is attached at Appendix 2.

Planning Statement Structure

1.13 The remainder of this Statement is set out as follows:

- **Section 2** describes the Site and its surroundings;
- **Section 3** summarises the pre-application discussions which have taken place and public engagement carried out;
- **Section 4** summarises the scheme proposals;
- **Section 5** considers the prevailing Development Plan context within which the planning application should be considered
- **Section 6** identifies all other material considerations, including national planning guidance;
- **Section 7** sets out the planning balance and assesses the scheme proposal against the Development Plan, having regard to other relevant material considerations; and
- **Section 8** concludes the case for granting planning permission.

2. Site Context

The Site and its Surroundings

2.1. The Site, which is approximately 37.7ha, contains Caversham Park House, which is a former stately country house and is shown edged red on the Location Plan at Appendix 1. It is located to the north of Reading town centre, close to Emmer Green and Caversham which are both suburbs to the north of Reading town centre. Caversham Park House is a Grade II Listed Building and its grounds are designated as a Registered Historic Park and Garden.

2.2. The Site is irregular in shape and consists of Caversham Park House to the north of the Site and the northern parkland. These lie on a plateau at the top of a south east facing slope. The parkland to the south of the house, extends south from the garden and pleasure ground, slopes steeply downwards from the main house. Panoramic views extend southwards from the house and garden terraces at the top of the slope across Caversham and Reading, towards low, distant hills, probably formerly with views of the Thames which lies 2km to the south.

2.3. The Site is currently served by a vehicle access from Peppard Road along its western boundary and to the west of Caversham Park House. This leads onto Caversham Park Drive, which is a private drive to the estate. The driveway is flanked by two stone gate piers, which are Grade II Listed, and the driveway passes a single store lodge standing adjacent to the south. Details of the proposed access arrangements are set out in Section 6 and within the Transport Assessment.

2.4. The Site is located within a predominantly residential area and is bounded largely by mid to late twentieth century, low rise residential development along its northern, eastern and western boundaries. To the south, the Site borders the Reading Crematorium and Cemetery and allotments and beyond this there a number of twentieth century houses.

2.5. The Site and buildings are currently vacant but were last used by the BBC as a Monitoring Building. Caversham Park was sold to the BBC in 1941 when the oratory school moved elsewhere who initially used the building as a headquarters as a monitoring station during the Second World War. Over recent years the BBC has been winding down their operations at Caversham Park.

2.6. The eastern and western boundaries in particular are defined by substantial existing belts of trees and hedgerows which provide an effective screening of the Site from views. Vegetation along the northern boundary also provides a degree of screening from Bath Road.

Statutory and Non-Statutory Designations

2.7. The Site lies within the boundary of Reading Borough Council (RBC) and forms a number of statutory listed buildings and a Registered Park and Garden. The Site also has the following designations in the adopted Reading Borough Local Plan (RBLP) as defined on the proposals map.

- CA2: Caversham Park
- EN13: Major Landscape Feature

2.8. The Site constitutes Caversham Park which is a Registered Park and Garden (List Entry Number 1000524) and Caversham Park House which is a Grade II Listed Building (List Entry Number 1113560), which was a country house largely rebuilt in 1850. Caversham Park was assigned Grade II listing status as a registered park and garden in 1987 and there have been no amendments to the listing status since this time. A number of ancillary structures listed below are also Grade II Listed.

- Inner Park Walls at Caversham Park: Grade II Listed under List Entry Number 1113561
- Entrance Gates and Gate Piers to Caversham Park: Grade II Listed under List Entry Number 1113559
- Temple to West of Caversham Park: Grade II Listed under List Entry Number 1302853
- The Walls at Former Kitchen Garden at Caversham Park: Grade II Listed under List Entry Number 1302854

2.9. Caversham Park is considered to be of architectural and historic interest for a varied number of reasons which will be expanded upon below. Caversham Park House was built in 1850, replacing almost entirely the eighteenth century mansion complex that previously existed on the site. The new building was constructed in the classical style to the designs of Horace Jones and has been subject to a number of alterations since construction, many of which would form part of the curtilage listing and have had an impact on the historic-architectural legibility of the building.

2.10. The Statutory list entry for Caversham Park states:

"A country house with the remains of an early C18 formal garden by Stephen Switzer flanking mid C19 formal terraces, surrounded by the remains of a landscape park laid out in the 1760s by Lancelot Brown."

2.11. The full statutory list entry for Caversham Park (BBC Records) states:

"Rebuilt, possibly by J T Crews, after the fire of 1850 for William Crawshay, a Welsh iron master, who had bought the estate in 1838. Of the early C18 house of the Earl of Cadagan nothing remains, and very little remains of the works by Mr Acres and Capability Brown in the Park. 2 storeys and basement. Ashlar with iron frame. Ground floor rusticated with Doric freeze over. Piano nobile above. 7 bays, outer wider with tripartite windows, divided by engaged Composite columns (end piers). Dentil cornice, baulaustraded parapet. Glazing bar sash windows with raised surrounds and bracket cills, pedimented on piano nobile (alternatively triangular and segmental). Flanking set back Ionic colonnades of 1840 by J T Crews. 9 bays each with balustrade over, returned to east, orangery to west. Various extensions to east (including chapel) and west (former school rooms etc) and also to north-west which has a classical Doric portico to linked lodge dated 1890. To rear of main house is an Ionic Porte Cochere (now a reception room). Interior retains

considerable decoration of the post-1850 house. Large central hall with 2 balustraded galleries, Doric on ground floor, Ionic on 1st floor. The best room is behind Crews West colonnade - arcaded with columned screen to west and apse colonnade to east. Elaborate decoration in the principal drawing room with enriched door pieces and so on. Chapel altered. A landmark for the railway."

2.12. A number of buildings, whilst not listed in their own right, are considered to be curtilage listed due to their association with the listed main house.

2.13. The Site also lies within an area of Major Landscape Feature as defined on the RBLP Proposals Map. This includes the southern part of Caversham Park.

2.14. The Site is not subject to any specific environmental designations such as Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB) or Site of Special Scientific Interest (SSSI), nor does it form part of the Green Belt. The Site does also not sit within a Conservation Area. The Site is also not located within an Air Quality Management Area.

2.15. In flood risk terms, the Site is located within Flood Zone 1, having the lowest probability of flooding. A Flood Risk Assessment accompanies this application and sets out the proposed drainage strategy for the Site. The Site is assessed to be at a very low risk of flooding from all sources examined.

Accessibility

2.16. The Site is accessed from Peppard Road to the west of the Site, which provides access to the residential areas of Emmer Green and Caversham and into Reading as well as to the strategic highway network.

2.17. The Site is in a sustainable location, within walking and cycling distance of many amenities and facilities. The majority of Caversham and Emmer Green are within walking distance of the Site and continuous footways extend throughout Caversham and surrounding areas providing sufficient pedestrian access.

2.18. In terms of public transport accessibility, a local bus service is also available from Buckingham Drive and is serviced by the 25 Pink, which goes to Reading. In addition to the local bus services, Reading rail station is approximately 3.5km south of the Site and provides access to high speed rail services to London Paddington Oxford as well as to the West Country.

Planning History

2.19. The Site has an extensive planning history. The most recent application (reference 100272) was in 2010 for solar panels to the rear (south facing) roofslope. Also of note is application 900507 comprising demolition of parts of existing building alterations & extensions to provide new kitchen and dining rooms, new offices and new editorial area, which confirms that the use of Caversham Park House is as an office.

2.20. Below are the applications considered relevant to the consideration of this proposal.

- 030268: Single storey rear extension: further addition to the extension approved under planning consent 00/00141/FUL, and revised parking facilities. Approved 2003.

- 9500026: Erection of 3 satellite receiving dishes. Approved 1995.
- 930506: Construction of car parks (as shown on plan number 1127-100A). Approved 1994.
- 910138: Retrospective application for two small ground mounted dish sites (each approx. 6 x 2 meters) in a field at the east end of the Caversham Park Mansion. Approved 1991.
- 910139: To mount up to six small satellite receiving dishes on a short wall (2m high) on the south side of a storage tank. Approved 1991.
- 900635: Construction of two detached dwelling houses. Approved 1990.
- 90/1091/LB and 90/1092/FD: Demolition of parts of the existing building alterations and extensions to provide new kitchen and dining rooms, new offices and new editorial area. Approved 1991.

3. Pre-Application Advice and Public Engagement

3.1. The National Planning Policy Framework (NPPF) encourages early pre-application engagement in order to deliver improved outcomes for the community (paragraph 39). The proposed development has been the subject of consultation with the local community and also discussions with the LPA prior to submission, as set out below. These assisted in the design and evolution of the proposals. A Statement of Community Involvement (SCI) accompanies the application.

Pre-Application Advice

3.2. Pre-application advice (ref 211685) was sought of RBC Officers in October 2021. At this stage advice was sought regarding the acceptability of the proposals in principle. A pre-application meeting took place in October 2021 and a written response was received on 5 November 2021, which is attached at Appendix 3.

3.3. The Council's written advice confirmed the following:

- Policy CA2 gives a clear steer for future development and sets out the expectations that the main focus for development will be the main house, involving its sensitive conversion to a use compatible with its heritage significance.
- The construction of a care home to the west of the main house would be on previously developed land but is in a highly sensitive heritage context adjacent to the listed building and within the registered park. Whilst some new development may be appropriate this remains heavily dependent on the findings of the heritage and landscape assessments. Any structure is likely to need to be subservient to the main house in scale and appearance.
- The construction of a row of town houses in place of the existing car park to the north east of the main house is problematic in terms of the effect on the special character of the registered park and the setting of the listed building. At this stage it is not certain that any significant development in this location would be acceptable.
- It is not clear that all areas that are proposed fall under the definition of 'previously developed land', or to the extent suggested. This is particularly evident to the areas of the site in the field containing the existing satellite dishes. Given the designations which apply to this land it is considered that the extent of any curtilage to these structures should be drawn tightly around the individual pockets of developed land. Much of this space would also reasonably be described as undesignated open space and Policy EN8 would apply. This largely undeveloped area should be treated as being for landscape enhancement to preserve the setting of the listed building and the special historic interest and openness of the registered park, rather than as a location for housing development.
- The land to the western edge of the site falls outside the Registered Park and Garden designation. The acceptability of the loss of this open space would be heavily dependent on the qualities of the remainder of the proposed development particularly whether provision of suitable wide ranging public access and improvements to recreational facilities are proposed in a way which outweighs the loss. The layout of this part of the development appears overdeveloped and an uninspiring housing estate layout rather than achieving high quality design.

- The proposals involve the removal of one visually prominent mature tree and any replacement building would need to comply with the tests set out in Policy CA2 in respect of the impact on heritage significance, the character and appearance of the registered park and the effect on trees.
- Policy EN5 identifies views towards Caversham Park from the A329(M), railway and surrounding street as being a 'significant view with heritage interest'. The Heritage Assessment and Landscape Assessment will need to address these views.
- The Site is likely to be of significant archaeological interest.
- A full Heritage Assessment will be required.
- A detailed Landscape Assessment will be required.
- A suitable Ecological Assessment will be required.
- A detailed tree Survey and Arboriculture method Statement will be required.
- It is expected that 30% of new dwellings to be secured as Affordable Housing.
- The scheme should include public access which will be secured through a legal agreement.
- The issue of environmental sustainability needs to be fully considered.
- Improvements and links to existing cycle routes will be required together with improved facilities.
- A Transport Assessment, including a full exploration of potential improvement will be required to be development and will need to demonstrate that the development would provide car and cycle parking that is appropriate to the accessibility of the Site. Provision of car club vehicles is also an importance to consideration and may fit well with an assisted living model.
- S106 are likely to be extensive for this scheme but will include securing Affordable Housing, the areas and natures of public access, controls on the natures of the use.
- CIL is chargeable.

3.4. Further consultation took place with Historic England and RBC's Planning Department on the 12 January 2022, with a tour of the Site and inside the principal building and a written response was received on the 10 February 2022 and is attached at Appendix 4. Their comments are summarised as:

- Concerns raised with the eastern parcel of development and the terrace of houses to the front of Caversham Park, which are considered to cause harm to the historic park and garden.
- The proposed row of terraced houses will undermine the understanding and experience of what a house like this aimed for.
- The proposed housing to the east would harm the purpose of the country house to be set within splendid isolation.
- The proposed car parking to the north of the house would cause harm through unsympathetic change in appearance of the dwelling driveway and further erosion of parkland.
- The position of the proposed care home extension together with its proposed large scale would also, as currently proposed, cause harm to the house and garden.
- The housing proposed outside the boundary of the parkland is also likely to cause a degree of harm to the significance of the registered park, particularly where it is proposed to site hard up to the boundary as it will be visible within the context of the lodge and driveway. It is recommended that the housing is removed from locations adjacent to and within proximity of the boundary and development is only located further to the west.
- The conversion of the house, if carefully detailed would be likely to only cause some limited harm.

3.5. Further consultation took place with RBC officers in January 2022. A written response was received on 11 February which is also attached at Appendix 3. Their comments are summarised as:

- The replacement building appears too large for the location and would disrupt the ordering of primary and secondary elements of the building.
- It is likely that some loss of open space can be justified but only if sufficient areas of parkland are opened up to public access through the application.
- Concerns are raised with regard to the layout and the density of the western development fronting Peppard Road.
- The extension to the pavilion is quite large and its justification will be heavily bound up with the extent of public access and the community benefits associated with it.
- The Eastern development would intrude into an area that would result in substantial harm to the character and appearance of the registered park and garden and the setting of the listed main house.
- The proposed housing within the former satellite woodland site would harm the fundamental purpose of the country house to be set isolated within a parkland setting.
- Concerns are also raised with the three storey block of flats with a large roof which would have a bulky form and appear to close to the main house. The other plots take the form of a nondescript modern housing estate layout which would add further harm to the character of the registered park and garden and setting of the main house.

3.6. The pre-application discussions have been taken into consideration in developing the final planning application scheme, as set out in detail within this Planning Statement and accompanying documents, including the Design and Access Statement prepared by BHP Harwood Architects.

Public Engagement

3.7. During the preparation of the planning application, a program of public consultation was undertaken in line with local and national planning policy. A public exhibition provided an opportunity for the local community and stakeholders to engage with the plans at an early stage, ask questions and provide feedback.

3.8. Community consultation was undertaken in the form of a leaflet drop to local residents and business and Ward Councillors and local stakeholders, advising of an exhibition on the 21 October 2021 at the Site. The Statement of Community Involvement which accompanies the application explains the key issues raised by the consultation responses and identifies those changes to the scheme proposals made as a result.

3.9. Additionally, the applicant set up a project website (https://caversham.squarespace.com/) which included the emerging plans. Full details of the consultation activity are included in the accompanying Statement of Community Involvement report.

4. The Proposed Development

4.1. The planning application is made in full with all matters for consideration. The development proposes;

- The conversion of Caversham Park House, which is Grade II Listed, to provide 64 Assisted Living Units (Class C2) in a mix of 23 x 1 beds apartments, 39 x 2 beds apartments and 2 x 2 bed houses. Internal and external changes to Caversham Park House are kept to a minimum given its Grade II listed status.

- The construction of a two storey 64 bedroom Care Home (Class C2) to the west of the main house following the demolition of existing buildings.

- The conversion of the existing buildings, Nos. 1 and 3 Caversham Park Drive, from their existing ancillary residential use to 1 x 2 bed apartment and 3 x 2 bed houses.

- Erection of 33 new homes in the enclosed field to the north of the BBC Records Centre, fronting Peppard Road and to the south of Caversham Park Drive on land lying outside the Historic Park and Garden boundary, referred to as Western Parcel development. A total of 28 of these houses will be affordable and the remaining 5 will be market dwellings.

- Erection of 18 houses lining Caversham Park Drive in the location of existing car parking, referred to as The Crescent, which would be available to the over 55s only.

- 30 new homes and 9 apartments on land to the east of the main house in the area of existing car parking, hardstanding and infrastructure referred to as Eastern Parcel development, which would be available to the over 55s only.

- Refurbishment and extension of the sports pavilion to provide a café and studio including the provision of 2 no. croquet lawns, 2 no. bowling greens, an additional tennis court and refurbishment of the existing tennis court.

- Associated landscaping and car parking on site.

4.2. The proposed age restricted housing is for the over 55's and has been designed with features to meet their needs including the changing needs over time, of older residents, which is set out within the Design and Access Statement.

4.3. The development has been designed to make efficient use of a sustainable, previously developed site within the boundaries of Caversham Park. It provides a high quality development which will contribute positively to the registered park and garden, Caversham Park House and the character of the area.

4.4. The proposed Care Home will be situated to the west of Caversham Park House and will involve the demolition of various small buildings, which are largely single storey. The Care Home will provide a purpose built 64 bed Care Home for the frail elderly and those living with dementia. 24 hour nursing care will be provided and is supervised by full time registered nurses and care assistances providing specialist care tailored to the individual residents as the majority will have acute physical and / or cognitive impairments. It is envisaged that Porthaven will occupy the building.

4.5. Pothaven Care Homes Group was formed in 2009 to offer residents the best of personalised care, comfort and companionship in care homes purpose built for 21st Century care. Their owners, management and staff have many year's experience in elderly health care, and utilise this for the maximum benefit of residents and their families.

4.6. The Care Home is a purpose built building and will be spacious and well equipped and will exceed all current and anticipated regulatory requirements. It will include various spaces for daily activities including communal lounge and dining areas, an activities suite, hair salon, private dining room, library and cinema. Additionally there will be staff facilities within the roof space, arranged as 2 No separate resident units per floor. Externally, the proposed Care Home will provide generous external amenity spaces including a secure private, external courtyard space located within the centre of the building. A terraced balcony area accessed from the dining room day space will allow for the views and landscaped garden to be more accessible for residents at first floor. The external spaces will provide a variety of experiences, seating areas and designations, with specific consideration for those with dementia, including sensory planting.

4.7. The Care Home and Assisted Living Units will work well alongside one another as does the combination of retirement dwellings and Assisted Living Units. Many residents downsizing to retirement dwellings will be able to future proof their older age because of the availability of Assisted Living Units and a Care Home on Site. A downsizer can be described as "a person who moves to a smaller property, typically after he or she retires".

4.8. The proposed conversion of Caversham Park House will provide 64 Assisted Living Units which would fall within a Class C2 Use with the residents being age restricted. There will be 23 x 1 bed assisted living units, 39 x 2 bed assisted living units and 2 x bed houses. The Assisted Living Units will be closely linked to the Care Home and will be able to utilise an element of care provided by the Care Home. Residents of the Assisted Living Units will be required to undertake an independent care needs assessment. It is expected that a care package is entered into comprising, as a minimum, 1.5 hours of care per week. In Beechcroft's experience elsewhere, in the majority of cases as an individual's length of residency continues, so the levels of care required often increases. The care services offered by the Care Home to meet the needs of the occupants of the Assisted Living Units, will also include, in addition to the personal care, laundry, meals and housekeeping. These are administered by the Care Home forming part of the overall institutional use. It is expected that the care package will be able to be secured through a legal agreement and ensure the Assisted Living Units remain as a C2 use. Additionally, the publicly accessible areas in the Care Home (i.e. the restaurant dining, hairdressers etc) will be available to the residents of the Assisted Living Units as and when required.

4.9. As outlined above, the Care Home will provide 24 hour care for the frail elderly and those living with dementia and the Assisted Living Units will provide a minimum of 1.5 hours of care. In practice, Porthaven currently enjoys positive relationships with GP surgeries in each of its care homes. Where the relationship is managed effectively between parties, there is no reason for a nursing care home or Assisted Living Units to impose difficulties onto a GP surgery and stretch current resources.

4.10. A common misconception is that immediately upon opening, a large influx of residents will flood the surgery's register resulting in GP's being unable to respond effectively. In practice, it takes between 12 and 18 months for a care home to fill. In addition, it is most likely that many residents who enter the Care Home or Assisted Living Units will already be registered at a surgery in the locality as they are likely to have moved from a house locally and therefore it does not generate significant 'additional' population. The development is close to local surgeries and consultation with the Clinical Commissioning Group (CCG) regarding the capacity of Doctor's surgeries has taken place before the submission of the application and no concerns were raised.

4.11. The proposed market and affordable housing mix will be;

Indicative Housing Mix		
Size	**Market**	**Affordable**
1 x bed apartment		3
2 x bed apartment	9	5
Gate house conversion to 2 x bed apartment	1	
Gate House conversion to 2 x bed house	3	
2 x bed dwellings	25	7
3 x bed dwellings	25	11
2 x bed Fog	3	2
Total	**66**	**28**

4.12. A total of 94 houses will fall within Class C3 of which 30% will be affordable housing. The affordable homes will all be located within the western parcel development.

4.13. The arrangement and siting of the houses and apartment buildings have been carefully designed so that they take into account the setting of Caversham Park House and the registered park and gardens. The proposed new homes and apartment building within the Site will be a mix of 2 and 2.5 / 3 storeys in height and have been laid out as development within a sylvan setting, seeking to retain all of the established trees on Site. Only the smaller fruit and ornamental trees are proposed for removal.

4.14. The houses include a mix of apartments, terrace, semi-detached and detached dwellings with private gardens and off street parking. Both the eastern parcel and western parcel are located and accessed by an internal road from Caversham Park Drive. These areas are designed with houses fronting that proposed internal road. The houses in The Crescent will follow the curve of Caversham Park Drive and front onto this road.

4.15. The apartment block within the eastern parcel is surrounded by landscaped gardens which is provided for communal use. Additionally private amenity space is provided in the form of balconies to some of the units.

4.16. Access to the Site will remain as existing from Peppard Road at the north-west corner of the park and via the existing private access drive known as Caversham Park Drive which leads to the front of Caversham Park House. These are described within the accompanying Transport Statement.

4.17. The car and cycle parking provision is in accordance with the relevant local standards set out within RBC's adopted Parking Supplementary Planning Document. Parking for the houses and apartments are provided either on plot or within a parking court adjacent to the property. A parking court is provided to the front of the proposed Care Home for its staff and visitors and parking is to the front of Caversham Park House, for the Assisted Living Units. Parking is also proposed along Caversham Park Drive.

4.18. Provision is made for waste and recycling storage on plot for all houses. Apartment blocks will be provided with dedicated waste and recycling stores, in accordance with RBC's requirements.

4.19. Access for the disabled will be accommodated in the design of the dwellings sufficient to comply with 'Access to and Use of Buildings' Part M of the Building Regulations and the Equality Act 2010. All residential units will have level access for wheelchair disabled person to the ground floor and accessible ground floor WCs as required by the Building Regulations.

4.20. The proposed new homes will be set within an attractive landscape setting which already benefits from substantial landscaping and trees, helping to provide a natural screen. The proposal removes only those trees required for the development, which involves only small ornamental trees and creates new areas landscaping that will substantially mitigate for the minor losses in vegetation required to accommodate the development.

4.21. Proposed is the refurbishment and extension of the sports pavilion to provide a café and studio including the provision of 2 no. croquet lawns, 2 no. bowling greens and an additional tennis court, which will be sited in the northern parkland to the north of Caversham Park House.

4.22. The Design and Access Statement that accompanies this application presents the proposals in more detail and provides an assessment of the context of the development, the design rational, the design principles and concept.

5. The Development Plan

5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs Local Planning Authorities to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise. Section 38(3) of the Act provides that the Development Plan includes the "*development plan documents (taken as a whole) which have been adopted or approved in relation to that area*". The adopted statutory Development Plan for Reading Borough Council comprises The Reading Borough Local Plan (adopted November 2019).

5.2. Material considerations also include national policy, which is primarily expressed through the National Planning Policy Framework and National Planning Practice Guidance, as well as additional guidance produced by the Council in the form of Supplementary Planning Documents (SPDs). These are considered further at Section 6.

The Adopted Development Plan

The Reading Borough Local Plan 2019

5.3. The Reading Borough Local Plan (RBLP) was adopted in November 2019 to guide development across the Borough until 2036. It sets out the overarching spatial strategy and housing requirements for the Borough for the plan period.

5.4. In general the RBLP seeks to ensure that, amongst other things, new development and existing areas are accessible and sustainable and to make the most efficient use of Reading's limited land, particularly previously development land, to ensure that as many new house as possible are delivered to meet identified needs. The Proposal's Map indicates that the following designations are relevant to the Site:

- Grade II Listed Registered Park and Gardens
- Grade II Listed Buildings including Caversham Park House

5.5. The key policies of relevant to the development proposed are summarised below:

5.6. **CC1: Presumption in Favour of Sustainable Development**: This Policy outlines that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the Framework. The Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise.

5.7. **CC2: Sustainable Design and Construction:** This policy outlines that all major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible.

5.8. **CC3: Adaption to Climate Change**: This policy requires all developments to demonstrate how they have been designed to incorporate measures to adapt to climate change. The Policy identifies measures including building orientation, shading, heating, ventilation, green or brown roofs and walls, planting and surface water run-off to deal with the effects of climate change, ensuring that development is resilient in the face of climate change.

5.9. **CC4: Decentralised Energy**: In meeting the sustainability requirement of this plan, developments are expected to demonstrate how consideration has been given to securing energy for the development from a decentralised energy source. Developments of more than 20 dwellings and/or non-residential development of over 1,000 sq. m should consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.

It also expects developments of over 10 dwellings or more or non-residential development of 1,000 sq. m or more to link into an existing district energy network, where one is present within the vicinity of an application site, or demonstrate why this is not feasible.

5.10. **CC5: Waste Minimisation and Storage:** This policy outlines that development should identify measures to minimise the generation of waste and to handle waste appropriately during the lifetime of a development.

5.11. **CC6: Accessibility and the Intensity of Development:** This policy outlines that the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities. Unless it can be demonstrated that the accessibility of a site is to be significantly upgraded (e.g. by providing high quality pedestrian routes of access to public transport), any development must be at a scale, density and intensity appropriate to that level of accessibility.

5.12. **CC7: Design and the Public Realm:** This policy requires that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. Development Proposals are expected to;

- Respond positively to the local context and create or reinforce local character and distinctiveness
- Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion
- Address the needs of all in society and are accessible, usable and easy to understand by them, including suitable access for all potential users, including disabled people
- Are visually attractive as a result of good high quality built form and places, the inclusion of public art and appropriate materials and landscaping.

5.13. **CC8: Safeguarding Amenity:** This Policy outlines that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of; privacy and overlooking, access to sunlight and daylight, visual dominance and overbearing effects of a development, harm to outlook, noise and disturbance, artificial lighting, vibration, dust and flames, smell, crime and safety or wind.

5.14. **CC9: Securing Infrastructure:** This policy requires that development proposals should mitigate all relevant impacts on local infrastructure in order to ensure that they are sustainable.

5.15. **EN1: Protection and Enhancement of the Historic Environment:** This policy outlines that all proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. It outlines that applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings. Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration. Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

5.16. **EN2: Areas of Archaeological Significance:** This policy requires where the site is likely to be of significant archaeological interest and assessment of the archaeological impacts of the development proposal will be required before the application can be determined.

5.17. **EN5: Protection of Significant Views with Heritage Interest:** This policy outlines that new development should not harm and where possible should make a positive contribution to views of acknowledged historical significance. The view towards Caversham Park House from the A329 (M), railway and surrounding streets merit special protection.

5.18. **EN6: New Development in a Historic Context:** This policy outlines that in areas characterised by heritage assets the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development

5.19. **EN7: Local Green Space and Public Open Space:** This policy sets out the Local Green Spaces and Public Open Spaces that will be protected from development.

5.20. **EN8: Undesignated Open Space:** This policy outlines that there is a presumption in favour of retention of undesignated open space. Development may be permitted where it is clearly demonstrated that replacement open space, of a similar standard and function, can be provided at an accessible location close by, or that improvements to recreational facilities or remaining open space can be provided to a level sufficient to outweigh the loss of the open space.

5.21. **EN9: Provision of Open Space:** This policy requires that all new development should make provision for appropriate open space based on the needs of the development. On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. Development must ensure satisfactory provision of children's play areas and neighbourhood parks.

5.22. **EN10: Access to Open Space:** This policy states that in areas with relatively poor access to open space facilities, new development should make provision for, or contribute to, improvements to road and other crossings to improve access to green space and/or facilitate the creation of linking of safe off road routes to parks.

5.23. **EN12: Biodiversity and the Green Network:** This policy outlines that all new development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been. On all sites, development should not result in a new loss of biodiversity and geodiversity, and should provide a net gain for biodiversity where possible

5.24. **EN13: Major Landscape Features and Areas of Outstanding Natural Beauty**: This policy outlines that planning permission will not be granted for any development that would detract from character or appearance of a Major Landscape Features

5.25. **EN14: Trees, Hedges and Woodland:** This policy requires that new development should make provision for retention and planting of trees. In view of the climate emergency, EN14 will be applied rigorously. Where new planting is secured on development sites by condition, the Council will seek to secure resources to ensure that this is monitored and, where necessary, enforced.

5.26. **EN15: Air Quality:** This policy requires that development that would detrimentally affect air quality will not be permitted unless the effect is mitigated. Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring

5.27. **EN16: Pollution and Water Resources**: This policy prevents harmful development where it would not be damaging to the environment and sensitive receptor through land, noise or light pollution and mitigates the impacts of potentially polluting developments. Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use. It will ensure that damage to Reading's environment is avoided.

5.28. **EN17: Noise Generating Equipment:** This policy requires that noise generating equipment is proposed, it must be at least 10dBA below the existing background level as measured at the nearest sensitive receptor.

5.29. **EN18: Flooding and Drainage**: This policy directs development away from areas that are liable to flood. In areas of lower risk, development may move forward if it passes the exception test in the NPPF. It also requires major developments to incorporate Sustainable Drainage Systems (SuDS). This policy will help to protect people and property from flooding.

5.30. **H1: Provision of Housing**: This policy requires the provision of at least an additional 15, 847 homes over the plan period.

5.31. **H2: Density and Mix:** This policy outlines that the appropriate density of development will be informed through; the character and mix of the area, including consideration of nearby heritage assets; its current and future level of accessibility by walking, cycling and public transport; the need to achieve high quality design; the need to maximise the efficiency of land use; and the need to maximise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.

Wherever possible, housing should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms. As a minimum on new developments for 10 or more dwellings, outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more.

Residential proposals for ten houses or more will consider making appropriate provision for plots as self or custom builds where viable and achievable.

5.32. **H3: Affordable Housing:** This policy requires that on sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing. Provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.

5.33. **H5: Standards for New Housing**: This policy outlines standards for new-build housing, including those for sustainable design and construction. All new-build housing must be built to the higher water efficiency standard under the Building Regulations. All major new-build residential should achieve zero carbon homes and all other new-build housing must achieve a minimum 19% improvement over the 2013 Building Regulations target. On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings. This policy will help to deliver high-quality new homes and achieve Reading's emissions targets, as well as mitigate the effects of climate change.

5.34. **H6: Accommodation for Vulnerable People:** This policy outlines that provision will be made for at least an additional 253 residential care beds paces for elderly people between 2013 and 2036, in addition to the overall housing need. Other specialist accommodation for vulnerable people will address the identified needs, which are primarily for accommodation that enables occupants to live as independently as possible, particularly for older people and people with physical disabilities.

Development for specialist accommodation for vulnerable people will fulfil the following criteria:

- Developments will, where possible, locate accommodation close to, or incorporate, relevant community facilities, such as healthcare services, or day care for elderly people
- Where development would result in a loss of general housing, it must meet identified needs in the most up-to-date Housing Strategy and be able to accommodate at least an equivalent number of people
- Larger developments will include adequate provision for ambulance access
- Development will incorporate areas of green space, which are particularly important for many groups of vulnerable people

- Developments within residential areas will be designed to respect the residential character of their surroundings
- Where a development requires a new physical link between buildings and where the gaps between buildings form part of the character of a street, the need for a linkage must be clearly demonstrated, and must avoid negative impacts on the character of the street
- Development catering for people with limited mobility will fulfil the following criteria
- Developments should be located within 400 metres of an identified district or local centre and a bus stop on a strategic bus route
- Development should include secure storage for mobility scooters

5.35. **H10: Private and Communal Outdoor Space:** This policy requires that dwellings will be provided with functional private or communal open space, including green space, children's play areas, home food production etc. These open spaces should be appropriately related to main entrances, enhance safety and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing.

5.36. **TR1: Achieving the Transport Strategy:** This policy states that the proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan. Planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities. All development proposals should ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development

5.37. **TR3: Access, Traffic and Highway-Related Matters:** This policy outlines that in determining proposals involving a new or altered access onto the transport network, improvement works to the transport network and the generation of additional trips, consideration will be given to the effect on safety, congestion and the environment.

5.38. **TR4: Cycle Routes and Facilities**: Policy TR4 requires that existing cycle routes should be enhanced. Improvements and links to existing routes will be required together with improved facilities. It is noted that Routes R4 and R41 run around the site perimeter with Route 40 and National Route 5 close by to the west.

5.39. **TR5: Car and Cycle Parking and Electric Vehicle Charging**: Development should provide car and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.

5.40. **OU1: New and Existing Community Facilities**: This policy outlines that proposals for on-site intensification of important facilities, such as schools and healthcare users, will be supported, subject to other policies in the plan. Although this may result in some loss of open areas, this may be acceptable where the impact on open areas is minimised, and the area has no specific use, or where that use can be satisfactorily be accommodated elsewhere on site.

New facilities should be located where there is a choice of means of travel and in existing centres where possible. Redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility.

5.41. **CA2: Caversham Park**: The Policy describes the heritage and landscape sensitivities of the site and is clear that any new development should be limited to the conversion of the main house to residential, cultural, community or heritage uses. The policy does not allocate the site for additional development beyond conversion of the house but does acknowledge that there may be some scope for some limited development on previously developed land within the site, which would need to be justified. The policy sets criteria which such development must comply with:

- No development will negatively affect the significance of heritage assets and their setting
- Development will not detract from the character or appearance of the important landscape
- Development will not negatively affect significant trees or areas of biodiversity importance

The policy outlines that proposals should open as much of the park as possible to public access.

6. Other Material Considerations

6.1. Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires that all material considerations are taken into account in decision-making. The following material considerations are relevant to this planning application and are considered in turn below:

- National policy contained within the National Planning Policy Framework ('the Framework') (July 2021) and the supporting National Planning Practice Guidance ('the PPG') (March 2014, as amended).
- Nationally Described Space Standards
- The Planning (Listed Buildings and Conservation Areas) Act 1990
  - Reading Borough Council's Supplementary Planning Documents relating to:
  - Sustainable Design and Construction (2019);
  - Affordable Housing (2021);
  - Employment, Skills and Training (2013)
  - Planning Obligations Under S.106 (2015); and
  - Parking Standards and Design (2011).
- Other Reading Borough Council Guidance and Evidence Documents:
  - Reading Tree Strategy 2021;
  - Strategic Housing Market Assessment (2016);
  - Culture and Heritage Strategy 2015-2030;
  - Local Transport Plan 2011 – 2026;
  - Climate Emergency Strategy 2020-25; and
  - Local Cycling and walking Infrastructure Plan 2020-2030.
- The Council's adopted CIL Charging Schedule (May 2018)
- The current housing land supply position and Housing Delivery Test.

The National Planning Policy Framework 2021

6.2. The revised National Planning Policy Framework ('the Framework') was published in July 2021 and replaced the 2012, 2018 and 2019 versions. The revised Framework sets out the Government's policies for the planning system and maintains that a presumption in favour of sustainable development remains at the heart of the Framework (paragraph 10).

6.3. The Framework makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development which has the following mutually supportive and interdependent objectives:

- ***"an economic objective*** *– to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

- ***a social objective*** *– to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

- ***an environmental objective*** *– to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy." (para. 8, the Framework).*

6.4. Paragraph 9 clarifies that these objectives "*...should be delivered through the preparation and implementation of plans and the application of the policies in this Framework"* and explains that both Local Plans and decisions should take account of local circumstances, so that they respond to the different opportunities for achieving sustainable development in different areas.

6.5. Paragraph 10 sets out the presumption in favour of sustainable development at the heart of the Framework which, at paragraph 11c), is defined for decision-making as: "***approving development proposals that accord with an up-to-date development plan without delay".***

6.6. In addition, the Framework, at paragraph 38, requires LPA's to *"…approach decisions on proposed development in a positive and creative way" and "… seek to approve applications for sustainable development where possible".*

6.7. The presumption in favour of sustainable development is set out at paragraph 11. For decision taking, the injunction remains to approve proposals which accord with an up to date Development Plan without delay (para. 11c). Where there are no development plan policies, or those policies most important for determination the application are out of date, the proposal should be approved unless one of two exceptions applies (para. 11d), these being:

- when the policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed (with reference to Footnote 7); or

- when the adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the Framework policies when taken as a whole.

6.8. For the purposes of paragraph 11d, Footnote 8 states that Local Plan policies will be considered out of date where a five year supply of housing cannot be demonstrated or the Housing Delivery Test (HDT) indicates that the delivery of housing was substantially below (less than 75%) of the housing requirement over the previous three years. Transitional arrangements govern the HDT at Annex 1 of the Framework.

6.9. Additionally Footnote 7 clarifies that a designated heritage asset falls under paragraph 11d(i).

"Decision-taking"

6.10. In addition the Framework, at paragraph 38, requires LPAs to "...approach decisions on proposed development in a positive and creative way" and "...seek to approve applications for sustainable development where possible".

"Delivering a sufficient supply of homes"

6.11. The Framework states that to support the Government's objective of "significantly boosting the supply of homes", it is critical that a sufficient amount and variety of land can come forward "where it is needed" (para. 60). The assessment of housing need should follow the Government's standard methodology unless there are "exceptional circumstances" and include any unmet need from neighbouring areas (para. 61).

6.12. Paragraph 62 outlines that the size, type and tenure for housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

6.13. Paragraph 74 requires Local Planning Authorities (LPAs) to identify and annually update a "...supply of specific, deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or their local housing need where the strategic policies are more than five years old". It explains that the specific supply of deliverable sites should include a buffer (moved forward from later in the plan period) of:

a) 5% in all cases to ensure choice and competition in the market for land; or

b) 10% where the LPA relies upon a recently adopted Local Plan or annual position statement to demonstrate a five year supply of deliverable sites, to "...account for any fluctuations in the market during that year" (Footnote 40 defines the term 'recently adopted' for this purpose); or

c) 20% in those instances when "...there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply" (Footnote 39 confirms that from November2018, this will be delivery below 85% of the requirement) (para. 74).

6.14. Where housing delivery falls below 95% of the requirement over a three year period, paragraph 76 requires LPAs to prepare an action plan to assess the causes and identify actions to increase future delivery.

"Promoting healthy and safe communities"

6.15. The Framework states at paragraph 92 that "planning policies and decisions should aim to achieve healthy, inclusive and safe places…" and recognises at paragraph 98 that "…Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities".

6.16. Paragraph 99 outlines that 'existing open space, sport and recreation buildings and land, including playing fields should not be built on unless:….'the loss resulting from the proposed development would be replaced by equivalent or better proviso in terms of quantity and quality in a suitable location'.

6.17. Paragraph 100 outlines that public rights of way and access should be enhanced and opportunities taken to provide better facilities for users.

"*Promoting Sustainable Transport"*

6.18. Paragraph 105 of the Framework requires significant developments to be "…focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes".

6.19. Paragraph 106 of the Framework states that planning should 'minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities' and 'provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking'. In assessing applications for development paragraph 110 notes that specific applications for development should ensure:

a) *"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code46; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree".

6.20. Paragraphs 113 of the Framework requires those developments expected to generate a significant amount of movements to be accompanied by Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed.

6.21. The Framework states specifically at paragraph 111 that "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts of development are severe". Paragraph 112 states that applications should also:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas…

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

a) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

b) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

c) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."

"Making effective use of land"

6.22. Chapter 11 refers to making effective use of land and outlines that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 122 references that planning policies and decisions need to reflect changes in the demand for land and that they should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Paragraph 124 references achieving appropriate densities and outlines that; "Planning policies and decisions should support development that makes efficient use of land, taking into account:

a) "*the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well designed, attractive and healthy places."

"Achieving well-designed places"

6.23. The Framework recognises that good design is a key aspect of sustainable development, and "the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve" (paragraph 126), with further design guidance set out at paragraphs 127 to 136.

6.24. Paragraph 130 outlines that decisions should ensure that developments:

a) '*Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, whole not preventing or discouraging appropriate innovation or change (such as increased densities);
d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
e) Optimise the potential of the site to accommodation and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime ad disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience'.

6.25. Paragraph 131 emphasises the important contribution that trees make to the character and quality of urban environments, and that they can also help mitigate and adapt to climate change. Paragraph 131 states:

"Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users'.

6.26. Paragraph 132 emphasises that "Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests." It adds that "Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."

"Meeting the challenge of climate change, flooding and coastal change"

6.27. The Framework seeks to avoid inappropriate development in areas at risk of flooding and direct development to areas with the lowest risk of flooding. As the accompanying FRA confirms, the Site lies within flood zone 1, thereby being at the lowest risk of flooding. The application proposal would not give rise to any flooding or drainage capacity issues.

"Conserving and enhancing the Natural Environment"

6.28. Paragraph 174 requires decision takers to protect and enhance valued landscapes and, minimise impacts on biodiversity and provide net gains for biodiversity.

6.29. Paragraph 183 requires that sites should be suitable for their proposed use taking account of ground conditions and any risks arising from potential contamination.

6.30. The Framework seeks to contribute to and enhance the natural and local environment, including preventing new and existing developments from contributing to, and/or, being put at an unacceptable risk from noise pollution. In support of this, paragraph 185 of the Framework states that: *'Planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the Site or the wider area to impacts that could arise from the development. In doing so they should:*

- *mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and quality of life.*
- *identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason and*
- *limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

"Conserving and enhancing the Historic Environment"

6.31. Paragraph 190 requires plans to take into account the '*desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation' and 'the desirability of new development making a positive contrition to local character and distinctiveness'*.

6.32. Paragraph 194 require; '*In determining applications, local planning authorities should require an applicant describes the significance of any heritage assets affected, including any contribution made by their setting'.*

6.33. Paragraph 189 of the Framework requires *'local planning authorities in determining applications to take account of;*

a) The desirability of sustaining and enhancing the significance of heritage assets and outing them to viable uses consistent with their conservation;

b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and

c) The desirability of new development making a positive contribution to local character and distinctiveness'.

6.34. When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 199 states that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

6.35. The NPPF includes Registered Parks and Gardens within the list of designated heritage assets and explains at paragraph 200 that substantial harm to or loss of Grade II listed buildings or Grade II registered parks and gardens should be exceptional.

6.36. Paragraph 202 outlines that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including , where appropriate, securing its optimum viable use.

Planning Practice Guidance

6.37. The Government published the Planning Practice Guidance (PPG) in 2014 and have since updated relevant parts as appropriate. The PPG provides further detailed guidance accompanying the Framework.

6.38. The PPG encourages high quality design and states that: 'local planning authorities should give great weight to outstanding or innovative designed which help to raise the standard of design more generally in the area'

6.39. The PPG also provides guidance on relevant issues such as: sustainability and renewable and low carbon energy; design; housing need and quality; the natural environment and recreation; transport and travel plans; waste; viability; planning conditions; and planning obligations.

Nationally Described Space Standards

6.40. In March 2015 the Department for Communities and Local Government published a Technical Housing Standards document, setting out nationally described space standards for dwellings as follows:

Number of bedrooms (b)	Number of bed spaces (persons)	1 Storey dwellings	2 Storey dwellings	3 Storey dwellings	Built-in storage
1b	1p	39 (37)*			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	3
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.5
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	

Minimum gross internal floor areas and storage (m^2)

(*Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from $39m^2$ to $37m^2$.)

Table 3: Space Standards

Statutory Protection

6.41. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the legal requirements for the control of development and alterations which affect listed buildings or conservation areas (including buildings of heritage interest which lie within a conservation area). Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. The relevant legislation in this case extends from Section 16 of the 1990 Act which states that in considering applications for listed building consent, the local planning authority shall have special regard to the desirability of preserving the Listed Building or its setting or any features of special architectural or historic interest which it possesses. Section 66 further states that special regard must be given by the authority in the exercise of planning functions to the desirability of preserving or enhancing Listed Buildings and their setting.

6.42. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the Local Planning Authority shall have 'special regard' to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.

6.43. The development area contains a number of Grade II statutory listed buildings as well as curtilage listed structures, all of which are situated within a Grade II registered park and garden. As such, the special architectural, historic and/or archaeological interest of the relevant heritage assets resides primarily in the historic fabric of the built elements, as well as their immediate settings.

6.44. The potential impact of the proposals relates both to the fabric and settings of the Grade II listed heritage assets, registered park and garden as well as views of local importance (outlined within local policy EN5). In regard to the 1990 Act as described above, it is judged that the proposals will result in no adverse change to the historic fabric of importance, existing settings and the 'special architectural or historic interest' of the identified statutory listed buildings and registered park and garden. Therefore it is an application of the NPPF that resolves the statutory duties in regard to the 1990 Act as described above.

Supplementary Planning Documents

6.45. The following Supplementary Planning Documents are relevant to this proposal.

- Sustainable Design and Construction (2019);
- Affordable Housing (2021);
- Employment, Skills and Training (2013)
- Planning Obligations Under S.106 (2015); and
- Parking Standards and Design (2011).

Sustainable Drainage and Construction SPD (2018)

6.46. The Sustainable and Construction SPD is intended to guide developers and decision-makers on the implementation of key sustainability policies set out in the Reading Local Plan, namely CC2-CC5, EN18 and H5.

6.47. This sets out that Sustainability Statements are required which typically require the developer to consider all aspects of development form which can contribute to securing high standards of sustainable development from the outset.

6.48. The SPD sets out that Major New-build Residential should be Zero Carbon (or if unachievable, a minimum 35% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations and planning contribution to offset remaining carbon emissions to zero). Major Creation of new residential units, including C2 through conversion from other uses and/or major refurbishment should be BREEAM 'Excellent'.

Affordable Housing (2021)

6.49. The Affordable Housing SPD provides additional detail on the interpretation and application of Saved Policy H3 of the Local Plan with respect to affordable housing, which requires on developments of 10+ dwellings, provision of affordable housing is expected to take the form of on-site provision.

6.50. The document outlines that the policy will not be applied to student accommodation, residential care or other specialist provision falling within the C2 use class or proposals for serviced apartments, unless:

- They are being developed on an allocated housing site or where affordable housing would have been anticipated;
- In the case of an apart-hotel

6.51. The tenure Split for the housing is:

- Affordable rented accommodation at 'Reading affordable rent' levels (defined as rental levels capped at 70% market rent) – at least 62%
- Affordable home ownership (including shared ownership or another product e.g. First Homes) – a maximum of 38%, of which the NPPF (paragraph 64) sets a minimum requirement of 10%

Employment Skills and Training (2013)

6.52. This SPD sets out the obligations which will be sought from developers at the construction and end user phases of development to contribute towards a range of employment, skills and training measures to mitigate the impacts of development to ensure that local people can better access job opportunities arising from new development.

6.53. The SPD contributes towards delivering the aims of adopted Core Strategy Policy CS3: "Social Inclusion and Diversity, which requires that major developments demonstrate measures to enhance social inclusion in terms of access to a range of services including employment, and that new development does not result in or increase the potential for economic and/or social disparity".

Planning Obligations Under S106 (2015)

6.54. The Planning Obligations SPD sets out the Council's approach towards securing contributions and obligations from new development, alongside the Community Infrastructure Levy (CIL) and which is outside the remit of CIL. The SPD explains this will be for affordable housing provision and for site related infrastructure requirements including open space, green infrastructure and biodiversity; highways, access and transport; education; leisure and culture.

Parking Standards and Design (2011)

6.55. This SPD provides guidance for public and private car parking within the town centre. Caversham Park lies within Zone 3, Secondary Core Area (purple region).

6.56. The car parking standards for C3 are the required standards. Should a developer require fewer spaces than are set out then this would need to be demonstrated to show that there would be no detriment to highway safety as a result. Under exceptional circumstances developers can provide less parking.

6.57. The table below provides the pertinent elements of the local parking standards in the SPD which are reproduced below.

Land Use	Per	Maximum Number of Parking Spaces
C3 Dwelling Flat	1-2 bed	1.5
C3 Dwelling Flat	3+ bed	2
C3 Dwelling House	1 bed	1
C3 Dwelling House	2 bed	1.5
C3 Dwelling House	3 bed	2
C3 Dwelling House	4+ bed	2
Visitor Parking		1 space per 4 dwellings (Flats only)
Care Home		
C2 Nursing Home		1 per FTE staff & 1 per 4 residents
Retirement Flats and Houses		
For a retirement village, parking requirements will be determined separately.		
Disabled Parking		
3 disabled spaces or 5% of total capacity, whichever is greater.		

6.58. Disabled parking is required for all zones and are:

- Up to 200 spaces – all developments: 3 disabled spaces or 5% of total capacity, whichever is greater
- Over 200 spaces – since CVP falls within residential / hospital, this will be determined through the Transport Assessment.

6.59. Parent / Toddler Parking: The suggested levels for all zones are as follows;

- Up to 200 spaces – 2 spaces or 4% of total capacity, whichever is greater
- Over 200 spaces – 3 spaces plus 3% of total capacity

6.60. Cycle parking is required as a minimum and should be applied as minimum standards.

Minimum cycle parking standards	
	Zone 1 - 4
Residential	
C1 Hotels	1 space per 6 staff
C1 Guest House and B&B	1 space per 6 staff
C2 Halls of Residence	1 space per 3 staff & 1 space per 5 students
C2 Hospitals (In Patients)	1 per 3 staff plus 1 space per 5 beds
C2 Hospitals (Out Patients)	1 per 3 staff plus 1 space per 3 consulting room
C2 Nursing Home	1 per 3 staff
C3 Retirement Home (Spaces per individual unit)	1 per 3 staff / 1 space minimum
C3 Dwelling Flat 1/2-bed	0.5*
C3 Dwelling Flat 3+-bed	1*
C3 Dwelling House 1-bed	1
C3 Dwelling House 2/3-bed	2
C3 Dwelling House 4-bed +	2

Other Reading Borough Council Guidance and Evidence Documents

Reading Tree Strategy 2021

6.61. The Council's climate emergency declaration in 2019, has provided a commitment towards a carbon neutral Reading by 2020, addressing the greatest challenges we face – Climate Change. This new Tree Strategy complements the Climate Emergency Strategy 2020-25 SPD, addressing some of its actions.

6.62. The SPD contributes towards delivery the aims of Policy EN14: Trees, Hedges and Woodlands, where "New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough…".

Strategic Housing Market Assessment (2016)

6.63. The Berkshire Strategic Housing Market Assessment considers the need for new residential care bedspaces (within the C2 use class) alongside more general housing requirements. It identifies a need for 253 bedspaces within Reading up to 2036, which policy H7 of the RBLP aims to provide.

6.64. There was a net gain of only 4 new bedspaces delivered this year. In total, a net loss of 58 residential care bedspaces has been recorded over the period of the RBLP so far (i.e. between 2013 and 2020).

Culture and Heritage Strategy 2015-2030

6.65. 6.64. The Strategy's priorities and aims seek to ensure that culture plays a full role in making Reading a vibrant, tolerant and enjoyable place to live, work or visit. In terms of Heritage, the SPD states that "The local planning authority has a statutory responsibility to protect Reading's assets."

Local Transport Plan 2011 – 2026

6.66. This document forms Reading's Local Transport Plan (LTP)3 Strategy Plan and sets out the long term policy approach to 2026, developed to align with relevant local documents, such as the Local Development Framework and the Local Strategic Partnership vision Reading City 2030. Reading recognises that good transport is fundament in building sustainable and thriving local communities.

6.67. The LTP Strategy Plan provides the context for Reading in terms of the economy, environment and quality of life. Their long-term vision for transport in Reading is outlined within the context of the Sustainable Community Strategy and its three strands of People, Place, and Prosperity. At the heart of the vision is the aim of better 'Connecting Reading' and a transport system that enables people to move around – easily, safely, sustainably and in comfort.

Climate Emergency Strategy 2020-25

6.68. This SPD sets out the action required during this critical five-year period to work towards the objective of a net zero carbon Reading by 2030, the target adopted in the climate emergency declaration.

Local Cycling and Walking Infrastructure Plan 2020-2030

6.69. This Local Cycling and Walking Infrastructure Plan (LCWIP) sets out plans to transform the streets of Reading and encourage more people to choose cycling and walking for local journeys, or as part of longer multi-model journeys.

6.70. This LCWIP will be recognised as one of the sub-strategies to the Local Transport Plan. It is also recognised in the draft 'transport' action plan and will help us to work towards a carbon neutral Reading by 2030 through the creation of streets that are safe, clean and green and support people to cycle and walk for local journeys.

The **Council's Community Infrastructure Levy (CIL) (May 2018)**

6.71. RBC's CIL Charging Schedule is charged on new developments in the area to fund necessary infrastructure requirements, alongside contributions collected via S106 agreements.

6.72. The Charging Schedule applies a CIL rate of £120/sqm for residential development on the Site. There is no CIL requirement however for care homes. The Council's accompanying Regulation 123 List states that CIL receipts will be used to fund local infrastructure relating to transport, education, social, leisure facilities projects, open spaces, economic support, renewable energy infrastructure and air quality.

The Council's Five Year Housing Land Supply Position

6.73. RBC's Annual Monitoring Report (AMR) outlines their Housing Land Supply and the Housing Trajectory, which is published annually in December. The most recent AMR from 2019-2020 outlines that Reading has a 6.67 years' supply of housing. In the most recently published Housing Delivery Test Results (published January 2022) RBC was deemed to have delivered 130% of its housing requirement over the preceding 3 years. The Council is therefore not operating under the presumption in favour of sustainable development.

7. Planning Considerations

7.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 provides that all decisions must be determined in accordance with the Development Plan, when taken as a whole, unless other material considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development. The Development Plan is described at Section 5 of this Statement. Further material considerations exist in the form of the Framework and the Council's supplementary planning guidance, as described at Section 6.

7.2. This Section of the Statement identifies those key issues that are material to the planning balance required in respect of this scheme, and presents the case in its favour under the following headings:

- Compliance with and weight to be afforded, to the Development Plan;
- Other Material Considerations and Assessing Impact;
- Benefits of the Proposed Development; and
- The Overall Planning Balance.

Compliance with, and weight to be afforded, to the Development Plan

7.3. In this particular case, the Development Plan comprises the policies in the Reading Borough Local Plan (RBLP). As the policies pertinent to the determination of this application are consistent with the Framework, it is considered that for the purposes of this application the Development Plan can be attributed significant weight.

7.4. The Site consists of Caversham Park which lies within the northern suburbs of Reading Borough, which is a Grade II Registered Park and Garden with Grade II Listed Buildings, including Caversham Park House.

Appropriateness of the Development

7.5. The Site lies within the designated area of Caversham Park where Policy CA2: Caversham Park of the RBLP sets out the vision for the Site. This policy describes the heritage and landscape sensitivities of the site and outlines that any new development should be limited to the conversion of the main house to residential, cultural, community or heritage uses. The policy does not allocate the site for additional development beyond conversion of the house but does acknowledge that there may be some scope for some limited development on previously developed land within the site where the development must comply with the criteria listed in that Policy which are;

- *No development will negatively affect the significance of heritage assets and their setting;*
- *Development will not detract from the character or appearance of the important landscape; and*
- *Development will not negatively affect significant trees or areas of biodiversity importance*

7.6. The proposed development incorporates the sensitive conversion of the Grade II listed Caversham Park House for residential housing in the form of 64 Assisted Living Units and communal areas. Section 16 of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that the local planning authority should have 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Paragraph 193 of the Framework outlines that when considering the impact of a proposed development on the significance of a designated heritage asset, 'great weight' should be given to the asset's conservation and the more important the asset the greater the weight it should be given.

7.7. The proposed conversion of Caversham Park House has been designed to be as sympathetic as possible to the historic fabric of this building and the overarching principle applied to the proposed conversion is the retention of the legibility of the historic plan form. This includes the demolition of the large modern extension which dominates the view of Caversham Park House as it is approached, which will be remodelled to restore the situation of the original building. The Heritage Statement details the significance of Caversham Park House and outlines that the use is a suitable use that is compatible with the building's heritage and that the areas of the building that are to be removed are not deemed to be features that contribute to its special architectural historic interest, specifically those sections within the western wing of the building which are of a later twentieth century date. It is considered that no harm will be undertaken converting the building to residential units, complying with Policy CA2.

7.8. Reflecting on the content of Policy CA2, the proposals also seek new development in the previously developed areas of the Site that are currently occupied by existing buildings, areas of hardstanding and satellite dish installations. A new Care Home is proposed immediately to the west of the main house where existing ancillary buildings would be demolished. 48 new homes and 9 apartments are proposed on land to the east of the main house in the area of the existing car park, hardstanding and satellite dishes. Additionally, the conversion of the existing buildings situated along the access drive into four residential houses are proposed. These parts of the Site are all occupied by existing forms of development and are defined as previously developed land (PDL), in line with the definition in the Framework.

7.9. The Framework defines PDL as:

'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape'.

7.10. The Framework at paragraph 120 states that substantial weight should be given to the value of using suitable brownfield land within settlements for homes, especially where the land is in a highly sustainable location. Additionally, it outlines that it should promote and support the development of under utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

7.11. With regard to the criteria listed in Policy CA2 – namely the impact to heritage assets, landscape impact and effect on trees and biodiversity – this is considered further within the Heritage Assessment and Landscape & Visual Appraisal and Arboricultural Impact Assessment. To summarise however, the erection of the Care Home and development to the east of Caversham Park House are sited to avoid a detrimental impact on the setting and significance of the listed buildings and the significance of the registered park and garden. Additionally, the Grade II listed heritage assets, namely the Registered Park and Garden, Caversham Park House, its ancillary structures and curtilage listed buildings will be preserved. Additionally, the Grade II listed registered park and garden will retain the features that contribute to its special interest despite the change in setting as a result of the proposals.

7.12. The proposed Care Home is located to the west of the main house and located within the setting of Caversham Park House and its registered park and gardens. The Care Home will be sited in a location which contains a parking area and a number of existing late twentieth century buildings, which are in poor condition and are not curtilage listed and where the consequential impact on the registered park and garden is already substantially reduced. Whilst appreciated that these buildings are a lower density and plot coverage than the Care Home, the Care Home has been designed to take into account the setting of Caversham Park. It has been designed to be of a scale and bulk that would be subordinate to Caversham Park House and setback in line with the main southern building line of Caversham Park House.

7.13. The proposed Crescent and Eastern Parcel development, which are located to the north and north east of Caversham Park House respectively, are located on land which is currently occupied by satellite dishes and car parks and is PDL. The loss of these existing structures improves the area and the historic context of the Site. This also focuses the homes on areas that have already been cleared of vegetation and had its historic landscape character eroded and therefore this development offers the opportunity to enhance the character of this area. The proposed development in these areas will ensure that the registered park and garden will retain the features that contribute to its special interest despite the change in setting as a result of the proposal and will be well screened from views of Caversham Park House by the existing trees and vegetation on site in this location. Whilst The Crescent is intended to replace the existing car park and will inevitably result in a change in setting, these houses have been designed to ensure that they are sympathetic in nature to Caversham Park House and will be laid out along a gentle curved terrace, following the alignment of the current parking areas. Additionally, the Eastern Parcel development will be well screened by existing trees on the Site, which are to be retained as part of these proposals and from the important views from the A329 (M) identified in Policy EN5 of the RBLP, as referenced in the Landscape & Visual Appraisal.

7.14. With regard to the landscape of the Site, The Landscape & Visual Appraisal outlines that the proposed development will not result in any significant adverse visual effects and will not detract from the character or appearance of the important landscape, which is also discussed further below. It outlines that all areas of the site currently benefit from a mature vegetated setting which provides a good degree of screening from the wider area, allowing only glimpses into the parkland and of the proposed development which would not result in a significant adverse effect. Whilst there are open views to the Site from the south, where Caversham Park House is a prominent local landmark, the mature woodlands within its grounds provide good screening to all of the proposed areas for development when viewed from the south. Additionally, the proposed development has been carefully sited to avoid the loss of trees within the Site and to retain as many as possible, which is also discussed within the Arboricultural Impact Assessment below.

7.15. The existing buildings to be converted into four residential houses are in existence and there will be little alteration externally from the existing situation. Accordingly, it is considered that these also comply with the criterion listed in Policy CA2.

7.16. It is long established that the Site is a development opportunity within Reading Borough to create a thriving, sustainable community which responds to modern demands by converting a Grade II listed Building into residential development with the very best in high quality 21st century design. The proposed development has been sensitively designed and located taking into account the historic context of the Site. The proposed development not only enables the impact of previous development to be mitigated, but also ensures that those areas of the registered park and garden and its setting that make material positive contributions to these heritage assets' significance are conserved. Overall, it is considered that the development would not negatively affect the significance of designated heritage assets and their setting, would not detract from the character or appearance of the important landscape and would not negatively affect the significant trees or areas of biodiversity importance, in accordance with Policy CA2 of the RBLP.

7.17. With regard to the Western Parcel development, this is considered to lie outside of the registered park and garden. It is however within the setting of the registered park and garden in relation to policy CA2 and is discussed further below. Policy EN8: Undesignated Open Space is also relevant and outlines that there will be a presumption in favour of retention of these undesignated open spaces. Development may be permitted where it is clearly demonstrated that replacement open space, of a similar standard and function can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space.

7.18. In relation to this policy, concerns raised by the Council refer specifically to the sections of land surrounding the proposed Western parcel development areas as well as sections of land surrounding the existing satellite dishes, both of which may be considered as undesignated open spaces. It is considered that the benefits of the proposed development, outweigh the loss of this open space which is currently private and serves no purpose. As such, in its present state it cannot be said to be used or enjoyed. The proposals are also contextually appropriate for the setting of this heritage asset that forms part of this open space by means of their inter visibility, scale, massing and high quality design. Additionally, the western development is appropriate within the wider built environment that surrounds it where larger plots of Caversham Park have previously been sold off and twentieth century housing estates have been constructed.

7.19. Currently Caversham Park is not open to the public. In addition to policy EN8, Policy CA2: Caversham Park of the RBLP outlines that any development or conversion proposals should open as much of the park as possible up to public access, including reinstatement of any historic public footpaths where possible and appropriate.

7.20. The applicant is not aware that there are any historic public rights of way across the site. It is however acknowledged that before the BBC owned the Site, there may have been informal access across the Site linking Peppard Way with Lowfield Road. However, when the BBC took over the Site, it would appear that these accesses were closed. These proposals will provide permission paths in the Site and enable the public to gain access to Caversham Park on a controlled basis. As part of the proposed development the applicant will introduce a circular path that will connect with Caversham Park Drive that will be accessible to members of the public on a controlled basis, allowing entry to an area that has previously been inaccessible. Additionally, it is proposed that the Cricket Pavilion will be extended to accommodate a small studio/meeting room and a café and that the current Cricket Pitch will be replaced with 2 no. croquet lawns and 2 no. Bowling Greens and an additional Tennis Court as well as the existing tennis court, all of which will be available for both the use of residents and the local community. There is the possibility of a future third croquet lawn, which will give the club an opportunity to grow. Additionally, the enhanced pavilion will be available for local meetings / clubs to access via the booking service.

7.21. Extensions are proposed to the existing pavilion building located adjacent to the northern parkland and the existing tennis court. These extensions would be to an existing building and Policy OU1: New and Existing Community Facilities is applicable. This policy outlines that proposals for on-site intensification of important facilities, such as schools and healthcare users, will be supported, subject to other policies in the plan. Although this may result in some loss of open areas, this may be acceptable where the impact on open areas is minimised, and the area has no specific use, or where that use can be satisfactorily be accommodated elsewhere on site. Additionally the Site is located within Caversham Park and accordingly Policy CA2 is also relevant.

7.22. The proposed extensions would be modest and relate to an existing community facility which is seeking to expand and provide community benefits. They seek to improve the facilities available on land which is previously developed and which would not conflict with the criteria listed in policy CA2. It is considered that the principle of this extension is acceptable.

7.23. Overall, it is considered that the proposed development would bring back into use a currently underutilised Grade II Listed building into a viable use which would utilise previously developed land and improve existing community facilities on Site, meeting the requirements of the Framework and Polices CA2, OU1, EN5 and EN8 of the RBLP.

<u>The Need for Specialist Housing</u>

7.24. A Housing Needs Assessment has been submitted to accompany this application which has been prepared by Three Dragons. The study was required to consider the need for retirement housing in light of the availability of retirement accommodation for the older population and current policies by RBC and its partners.

7.25. There is a national requirement for more housing and care homes within England. The Government places great importance on the provision of sufficient housing to meet local needs. Paragraph 59 of the Framework notes that is the Government's objective to significantly boost the supply of homes. In order to achieve this, the framework notes that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. National policy also requires the provision of a rolling 5 year supply of deliverable housing land.

7.26. The UK has an ageing population which is only set to become more and more pressing in the next ten years. A report published by the House of Lords on 10 January 2022 entitled *Meeting Housing Demand* outlines that; '*Our population is ageing: one in four people in the UK will be over 65 by 2050, increasing from 19% in 2019. This must be reflected in the types of new homes built, particularly as there will be an increase in older people living alone. This will include a mix of suitable 'mainstream' housing and specialist housing for later living'*.

7.27. As explained at Section 6 of this Statement, RBC considers that it has a five year supply of housing as required by the Framework and has achieved the housing trajectory, accordingly the tilted balance in paragraph 11 of the Framework is not engaged. RBC's policies governing housing supply, are 'in date'. It is clear however that the need for housing for an ageing population is acute. Regardless of whether a five year housing land supply can be demonstrated, RBC should ensure that where development can come forward which is in accordance with its spatial strategy, it should be encouraged to do so.

7.28. One of RBC's key foundations is to build self-reliance, recognise that within this goal a first priority is always to help people live independently for as long as possible.

7.29. The Berkshire Strategic Housing Market Assessment (SHMA) 2016 found that in Reading Borough itself the population aged over 65 years is expected to increase by 63.5% and for the 85+ cohort the increase is 130.6%. Alongside this there is a projected increase of 86.9% in those with dementia and 78.1% in people with mobility difficulties. The SHMA found a need for between 1,188 and 1,191 units of speciality accommodation for older people in Reading to be provided between 2013 and 2036. The proportion of these to be specialist homes in the market sector is identified at 63% or 997 units.

7.30. Local Plan Policy H6: Accommodation for Vulnerable People, sets out provision for care home beds and outlines that '*other special accommodation for vulnerable people will address the identified needs, which are primarily for accommodation that enables occupants to live as independently as possible, particularly for older people and people with physical disabilities'.*

7.31. The Supporting text to Policy H6 of the RLP outlines that;

'Reading is facing a range of housing needs over the coming years, and it is vital to recognise some of the more complex needs that should be taken account of specifically in future provision. Whilst some of these derive from an ageing population (for instance, the amount of people in Reading aged over 65 is expected to increase by more than 60% to 2065).

The Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA) assessed the likely level of need for residential care bedspaces for older people (within use class C2), based on projections of how many people are likely to suffer from issues such as reduced mobility and dementia. The SHMA identified a need for 2,226 additional residential care bedspaces in the Western Berkshire Housing Market Area to 2036, of which Reading's need is 253.

For many groups, accommodation that supports more independent living is required, rather than large new nursing homes. This may include extra-care housing, supported living and sheltered housing. Depending on factors including the level of care provided, this may fall into either the C2 or C3 use classes. The SHMA also assessed the need for specialist accommodation for older people, for example, and identified a need for 1,189 homes to 2036, although these homes would be included within the overall housing need identified in Policy H1.'

7.32. In relation to older persons' housing, the Framework defines 'older people' as people over or approaching retirement age including active elderly to the very frail, and whose housing needs can encompass accessible, adaptable general needs housing through to the range of retirement and specialised housing for those with support or care needs.

7.33. Within the RBLP it is acknowledged that the amount of people in Reading aged 65 and over is expected to increase by more than 60% to 2036. Policy H6 of the RBLP requires that 253 residential care bedspaces for elderly people are provided between 2013 and 2036, in addition to the overall housing need. Policy H6 also seeks to ensure that other specialist accommodation for vulnerable people should be identified to enable occupants to live as independently as possible.

7.34. An analysis of the potential demand for specialist retirement housing in Reading and Caversham is detailed within the Housing Need's Assessment. It outlines that there is a shortage of speciality older persons' housing for sale in the RBC area. Looking at demand in 2025, the earliest date when this development is likely to be on sale and using the Retirement Housing Group (RHG) Model, which produces results broadly comparable to the modelling approach taken from the SHMA, it concludes that at district level the RHG Model suggest a need for 144 units of sheltered housing for sale or shared equity and 197 extra care units for sale or shared equity. Looking just at the Caversham area, the RHG Model indicates a need for 67 units of sheltered housing for sale or shared equity and 78 Extra Care units for sale of shared equity are required. We are not aware of any applications for retirement housing schemes currently under consideration or coming forward in Reading or Caversham. It is therefore clear that there is a latent demand in the area for this type of development.

7.35. The proposed development would deliver a mix of housing types including Assisted Living Units, a Care Home and retirement housing, which will significantly boost the supply of homes for older people and those needing care, where there is a specific need of this type of housing compared to open market housing and would help to meet the Council's requirements including those set out in policy H6. In addition to this, future residents are likely to be 'locals' meaning that this will release more family housing to the market through people downsizing into retirement accommodation. Reading Borough Council's Annual Monitoring Report outlines that: '*The assumption has been made that entirely self-contained units free up one dwelling, whereas in care accommodation with shared facilities, two new residential care spaces free up one new home'*.

7.36. Additionally, the proposal will provide additional housing, both speciality and affordable housing, which is a fundamental part of the Government's agenda, to significantly boost the supply of housing. Whilst appreciated that RBC claim that they can demonstrate a 5 year housing land supply, that is not a ceiling nor is it a proper basis to withhold consent for otherwise sustainable development. Nationally it is a government policy imperative to boost the supply of housing, as set out at paragraph 59 of the Framework and this benefit is afforded significant weight.

7.37. Overall, the proposal provides much needed specialist housing and can help meet the Council's Housing Strategy objectives to enable residents to access support and maintain their independence, it frees up larger family housing units through local's downsizing, and it adds to the government's policy imperative to boost the supply of housing. Accordingly, the need for this proposal complies with Policy H6 of the RBLP and the Framework and significant weight should be attached to this clear benefit.

A Sustainable Location for Housing

7.38. The Site is located within Reading Borough Council's administrative boundary and within a suburb of Reading to the north of the River Thames. The Site is located in close to Emmer Green and Caversham, which contain a number of amenities and facilities, including a shop, post office, restaurants, doctors etc, which are within walking distance of the proposed development along well-lit pavements.

7.39. In terms of public transport and travel outside of Emmer Green, there are a number of bus stops available most notably on Buckingham Way. These services provide public transport into Reading town centre. Reading railway station is also accessible by bus from the site with frequent services to London Paddington, Oxford and the West Country.

7.40. Overall, it is considered that the Site is in a sustainable location for housing, in accordance with Policy CC6 of the RBLP and the Framework, taking onto account the essence of the Framework test which as to whether a genuine choice of transport modes is on offer.

Conclusion

7.41. The principle of this development, as demonstrated above, is acceptable and policies are up to date and reflect the guidance in the Framework. The relevant technical reports that accompany this planning application, which are discussed in detail further below, demonstrate that there are no unacceptable adverse impacts that would significantly and demonstrably outweigh the benefits associated with the proposals.

7.42. Therefore, and as required by S38(6) of the Planning and Compulsory Purchase Act 2004, and the Framework paragraph 11(c), development proposals that accord with an up to date Development Plan should be approved without delay. Indeed, there are no other material considerations which indicate otherwise – on the contrary the other material considerations, discussed below, reinforce the acceptability of the proposals and indicate that planning permission should be granted in accordance with the provisions of the Development Plan.

Other Material Considerations and Assessing Impact

7.43. The Site comprises of Caversham Park House and its associated registered parkland. Care has been taken to ensure that the impact of the proposed development on the Site and the local area is minimised and acceptable, through careful design and siting, and through the provision of access to new and usable open space.

7.44. The accompanying technical reports and assessments demonstrate that there are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations. The key considerations of the proposal are examined below, within the context of the prevailing Development Plan, where consistent with the Framework, and national planning policy and guidance.

Design Approach

7.45. This section should be read in conjunction with the Design and Access Statement, which provides a detailed description and full justification for the design of the development. As noted above, the proposed development proposes the renovation and conversion of Caversham Park House into 64 Assisted Living Units. The proposals also include the erection of a Care Home and removal of the structures and buildings in that area, the erection of houses and apartments to the east of Caversham Park House, and houses to the west of Caversham Park House accessed from Caversham Park Drive together with the conversion of existing buildings into 4 dwellings.

7.46. The design of the proposed development has been considered with care and a design-led approach has been taken, following extensive consultation with the public and engagement with Council officers and Historic England. Regard has also been paid to the Council's design requirements, within polices EN6, CC7 and H2 of the RBLP which require the development to make a positive contribution to the historic context of the area by respecting and enhancing its architectural and visual qualities, to be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located and amongst other things, the need to achieve high quality design respectively. Additionally, regard has been paid to the Framework's high standard for good design, which recognises that good design is a key aspect of sustainable development, and 'the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'.

7.47. The layout, scale, massing and architectural style of the proposed development responds appropriately to the Site's existing and emerging context and the technical works demonstrate that the Site can accommodate the amount of development proposed without significant adverse impacts. This has had regard to Caversham Park House being a Grade II Listed Building and the Site being a Grade II listed registered park and gardens. The design led approach results in a scheme that makes efficient use of the Site whilst preserving the setting of the adjacent heritage assets.

Site Layout

7.48. The application site is located within a residential suburb of Reading and comprises of approximately 37.7ha estate. The Site layout has been derived to reflect the nature of the Site and the registered park and gardens. Careful consideration has been given to the proposals to ensure that they have been designed to provide future occupiers with high quality accommodation. The proposed development within the grounds of Caversham Park comprises of four discrete elements: The western parcel, the Care Home, the Crescent and the Eastern Parcel. The Western Parcel, The Crescent and the Eastern Parcel stand alone and utilise the existing planting to visually and physically separate them from Caversham Park House. The proposed development has been sited within the northern section of the site, discreetly located so that views down to the southern parkland remain uninterrupted. The existing access point from Peppard Road and along Caversham Park Drive will serve the development and provide physical and visual links through to the main elements of the development which are centred around the main house and formal green space.

7.49. Views along formal and informal vistas are created by the building form and existing vegetation, with key frontages defining routes and spaces within the Site. The development has also been designed so that focal buildings turn corners, identify routes and create termination vistas within the Site.

7.50. The proposed Care Home will occupy an area already occupied by buildings and parking areas which date from the late twentieth century. The building has been set back from the estate road which enables this part of the development to respect the existing retained properties and will not detract visually from them. The building is then aligned along the southern boundary with Caversham Park House to respect the strong building line to the east. Whilst this building will involve the removal of some trees, the grounds of the Care Home have been carefully designed to retain all other existing trees as well as provide a green setting to the new building, including lawns, ornamental shrub areas and private patio spaces. The new building and grounds will be of a far higher quality that the existing ad hoc buildings and parking areas that exist in this area.

7.51. The proposed western parcel of development sits outside the registered park and gardens and is accessed from the main site entrance and sits within a mature tree screen. The layout is centred around a central green space containing a Local Area for Play (LAP) with continuous building frontages that will define the routes and spaces with associated small mews areas. New planting is proposed around the parking areas and with the open spaces which will help soften the area and integrate the new buildings within the surrounding landscape. This development is set away from Caversham Park House and will relate to the existing twentieth century development that will surround it and will be in keeping with the character of this development.

7.52. The proposed Crescent fronts onto Caversham Park Drive and is sited to the east of Caversham Park House. These houses will comprise of a Georgian style terrace of 12 No. homes, 4 No. homes and 2 pairs of semi - detached dwellings and will allow the rationalisation of the site and removal of the large car parking area that currently occupies this area. The proposed dwellings are set back from Caversham Park House, ensuring that views of the property to and from the grounds to the north and east are not compromised. The houses will be laid out along a gentle curved terrace, following the alignment of the current parking areas. This therefore focuses the homes on an area that has already been cleared of vegetation and has its historic landscape character eroded and offers the opportunity to enhance the character of this area.

7.53. The eastern development is located on the existing satellite field and is separated from Caversham Park House by dense mature tree screening. This part of the development is set within a sylvan setting and will comprise the retention of the mature trees surrounding it. The buildings will be orientated to reflect that of Caversham Park House itself, with the new homes clustered around small semi-formal courtyards and green areas. This area has been laid out so that there will be continuous building frontages that define routes and spaces, with occasional small mews area and focus buildings to the front of the Site. The buildings have been set out to enable the retention of all of the large mature trees that surround the area, however a number of smaller trees within the centre of the development area will be removed. These date from the twentieth century and do not contribute to the historic context of the registered park and garden.

7.54. The extension to the existing pavilion building is sited appropriately to the existing building and have been sensitively sited with regard to the setting of Caversham Park House and its registered park and gardens.

Scale and Massing

7.55. The immediate character of the area surrounding the Site is predominately twentieth century low density residential development. Caversham Park House will remain largely unaltered by its proposed conversion. The proposed built development will comprise 1.5 and 2 storey cottages, 2.5 storey town houses and 3 storey apartments and a 2 storey Care Home, which reflects the scale and massing of Caversham Park House. A variety of ridge and eaves levels are proposed which will create a likely roofscape adjoining legibility within the scheme.

7.56. The scale and mass of the new development will be subservient to Caversham Park House and cannot be said to pose a negative contrast to the surrounding heritage context. The closest development to this historic building will be the proposed Care Home, and careful attention has been given to its massing and scale so that it responds positively to its context along with its siting which is set back from the estate road and aligns with the southern building line of Caversham Park House.

7.57. The units lining Caversham Park Drive, referred to as The Crescent, are sympathetic in nature to the house itself, adopting a similar classical style evidenced through the Doric style porchways, sash windows, limestone and incised stucco detailing at ground floor level. Similar design motifs are evident through the design of the residential units intended to replace the satellite dishes directly east of the house. The Crescent will create a domestic scale 'street' set within a wooded area.

7.58. The western parcel development will be similar in scale and massing to the existing properties to the east and are judged to be contextually appropriate to the built environment surrounding it, with the gabled design and red brick evident within the pre-existing architectural context.

7.59. The proposed extensions to the pavilion building are single storey, respecting the size and scale of the existing building. Whilst relatively large in size, due to their flat roof design, it is considered that these extensions will remain adequately subordinate to the existing pavilion building,

Appearance

7.60. The principal appearance of Caversham Park House will remain as the main house of the estate. The proposals would improve the main building's appearance and particularly from the front, by removing the later twentieth century additions which site to the west of the building. These structures are considered detrimental to the significance of the listed building and their removal would be of benefit to the character of the main house and better reveal its significance. It is also proposed to remove the existing car parks from the area directly in front of the main house and satellite additions to the east of the main house.

7.61. The proposed Care Home reflects the existing architecture of Caversham Park House. The elevations have been designed to a high standard, with terraces and materially used to create rhythm and proposition. A strong main entrance elevation provides a sense of arrival and supported well be a definitive landscaping scheme. Balconies are a key feature for residents at first floor and these have been developed with feature stonework and columns. A feature eaves detail and varying roof heights create interest and break the ridge line of the homes.

7.62. The roof of the Care Home is designed with consideration of a traditional vernacular. Pitched gable features and a main roof line broken in a number of places assist in reducing the overall scale of the built form.

7.63. With regard to materials, the proposed Care Home and The Crescent will reflect the traditional Georgian proportions and classical style of the main House both of which are partially rendered to reflect the materially of the main house. Both the Care Home and Crescent introduce a yellow buff brick to reflect the Honey coloured stone used on the South facing elevation of Caversham Park House and a number of the properties in Emmer Green.

7.64. The use of yellow / buff brick and render continues into the eastern parcel with the design becoming more formal at certain places to provide landmark buildings with a scale and design to emphasis nodal points and space

7.65. The nature of the design of the proposed dwellings and apartment buildings, are sympathetic to the heritage context and local vernacular. Both Caversham and Emmer Green contain a variety of architectural styles, but they are generally very traditional in terms of character. This has been used as the design reference for the western parcel of the proposed development to ensure that the proposed dwellings sit comfortably in their location and respect their environment. They would be more indicative of the local vernacular styles that form their immediate context to the west, but would still adopt an appearance that would not adversely juxtapose their heritage context.

7.66. The proposed materials for the pavilion building have taken on a more contemporary appearance, which is considered would only serve to enhance the appearance of this building and Caversham Park.

Conclusion

7.67. Overall, it is considered that the proposed development will be of a high quality layout and design which will successfully integrate with the existing surrounding development and Caversham Park House and the registered park and gardens. It will create the right balance between development and amenity/soft landscaping reflecting the registered park and garden the Site is located within. The proposals are therefore in accordance with guidance embodied in the Framework and Policies CA2 and CC7 of the RBLP which required that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.

Effect on the Historic Context of the Site and the Wider Area

7.68. The submitted Heritage Statement, which accompanies this application, fully assesses the likely effects of the proposed development on designated and non-designated heritage assets, namely Caversham Park House (Grade II Listed) and its associated ancillary structures and the Registered Park and Gardens (Grade II Listed).

7.69. National policy in relation to heritage assets is set out at Section 16 of the Framework. Both this and the statutory duty places on local planning authorities by the Planning (Listed Buildings and Conservation Areas) Act 1990 are set out above. In addition, Policies CA2: Caversham Park, EN1: Protection and Enhancement of the Historic Environment, EN6: New Development in a Historic Context, CC7: Design and the Public Realm and H2: Density and Mix of the RBLP are relevant, which are also set out above. The application proposals have been carefully formulated with the intention that they would comply with these policy requirements and the statutory duty.

7.70. The site constitutes a mid-nineteenth century house situated within a historic park and garden, the surviving portions of which date at earliest to the seventeenth century, although the park has origins in the late Medieval period. Both are Grade II Listed. A number of statutory and curtilage listed structures also lie within the Site.

7.71. One of the principal aims of the proposal is to avoid causing material harm to the significance of Caversham Park registered park and garden and the listed buildings that lie within it, including Caversham Park House. Caversham Park House is the principle focal point of the Site as well as the Grade II listed ancillary structures that form part of the wider setting.

7.72. The Site and the listed buildings have been the subject of development in the 20th century that has resulted in the disruption of the legibility of both the building and its immediate as well as extended setting. The changes within the most immediate setting have made this detrimental contribution, namely the additional wings, both attached and detached which have disrupted the ability to read Caversham Park House within its historic context. Furthermore, large sections of the gardens were sold off during the 1960s to allow for the establishment of the Caversham Park estate and a large caravan site, which have both reduced the size of the original park and introduced suburban development into its setting, which have eroded its setting. Additionally, the grounds of the house were later interspersed with satellite dishes and various technical equipment.

7.73. Whilst Caversham Park House can still be understood within its setting which is largely retained, particularly so to the south where the landscape garden is clearly identifiable, the immediate and extended setting of the building has been eroded to a certain extent by later twentieth century developments which have had an adverse impact upon the legibility of the building within its context and do not make a contribution to its historic significance.

7.74. The proposed development provides a scheme which is fully informed by the heritage significance and interest of the Site, including the registered park and garden and the setting and significance of the listed buildings within the Site.

Caversham Park House

7.75. The proposals for the Grade II Listed Caversham Park House would see the conversion of the main house to 64 Assisted Living Units and communal areas. As part of this an internal courtyard is to be reinstated, which is currently glazed over. It is further proposed that portions of the west wing are to be removed and a new courtyard created.

7.76. This part of the proposed development would have a negligible and neutral impact upon the significance of Caversham Park House and subsequently no harm will result. The Grade II listed Caversham Park House, its ancillary structures and curtilage listed buildings will be retained in their entirety, with any changes to internal configuration and fabric relating to their residential adaption. Those areas of the building that are to be removed are not deemed to be features that contribute to its special architectural-historic interest, for example those sections within the western wing of the building which are of a later twentieth century date. Despite some proposed internal subdivisions and reconfigurations within the historic core of the building, the areas of importance, including any surviving fixtures and fittings, will be retained in their entirety.

7.77. With regard to the interior of the building it is considered to generally be of less historic architectural interest than the exterior, which will be preserved as part of proposals. The proposed internal subdivisions and reconfigurations within the house will focus on areas of the building that are not considered to contribute to its special architectural or historic interest. There are some internal subdivisions and reconfigurations within the historic core of the building and the areas of importance, however, including any surviving fixtures and fittings, will be retained in their entirety. Additionally, the principal rooms within the historic core of Caversham Park House retain their configurations and it is proposed that they will serve as either communal areas and / or Assisted Living Units, subsequently put to a use viable with their conservation.

7.78. Overall, the proposed changes to Caversham Park House are focusing on areas of the building which are not considered to make a meaningful contribution to its special architectural / historic interest. The sympathetic redevelopment of Caversham Park House will make significant improvements to the character and appearance of the building, which will provide a viable and sympathetic development and will protect and where possible enhance the historic features.

The Setting of Caversham Park

7.79. The key heritage consideration in relation to the proposed development is whether it will have a detrimental impact upon the setting and significance of the Grade II listed house and registered park and garden.

7.80. The Heritage Statement outlines that the special architectural landscape interest of Caversham Park is derived from the surviving features of the eighteenth and nineteenth century landscape. Due to later alterations and erosion of setting the surviving portions of the grounds that best illustrate this special interest is located to the south east of the site, alongside the remains of the canals, various landscape earth works and listed structures. The proposed development will retain these features that contribute to this special interest and will remove later twentieth century additions that detract from the setting of the House and the registered park and garden. Accordingly, the proposals will not have a detrimental impact to the setting of the House or the registered park and garden.

7.81. The Eastern parcel, Western parcel, The Crescent and the proposed Care Home directly adjacent to the Grade II listed Caversham Park House, will not detract from the ability to understand the heritage assets within their setting. The houses to the east will replace an existing car park which currently makes no contribution to the heritage importance of Caversham House and Park as well as the satellite dishes to the east which make a similar lack of contribution. The Care Home will replace a number of later ancillary buildings directly adjacent to the house, not considered to contribute to the overall special interest of the outlined heritage assets. The Western parcel development, whilst it will fall within the boundaries of the Grade II listed park and garden will not be within the site's historic boundaries, and will not detract from its overall historic-landscape legibility, especially given the already compromised setting to the south and the existing Caversham Park estate in close proximity.

7.82. Particular attention has been given to the overall design and appearance of all new residential units and they are of a high quality and contextual nature which would not result in a detraction of historic character and appearance, in line with the Framework and policies CA2, EN1, EN6, CC7 and H2 of the RBLP.

7.83. The scale and massing of the new dwellings would not pose a negative contrast to the surrounding heritage context. The Crescent which replaces the existing car park, are sympathetic in nature to the house itself, adopting a similar classical style evidenced through the Doric style porch ways, sash windows, limestone and incised stucco detailing at ground floor level. Similar design motifs are evident through the design of the residential units intended to replace the satellite dishes directly east of the house.

7.84. The units to the east, proposed to replace the existing car park and satellite dishes, would currently utilise limestone and would adopt a loosely classical style in keeping with the Grade II listed Caversham Park House. The Western parcel development will be more indicative of the local vernacular styles that form their immediate context to the west, but would still adopt an appearance that would not adversely juxtapose their heritage context.

7.85. While the Western parcel development will fall within the boundaries of the Grade II listed park and garden it will not detract from its overall historic-landscape legibility, especially so given the already compromised setting to the south, with large plots sold off for development during and after the mid-twentieth century, directly to the south of this Western parcel development. In addition, its impact is further reduced due to its reduced visibility provided by the existing tree coverage which surrounds this parcel of land. Overall, the Western parcel development is judged to be contextually appropriate to the built environment surrounding it, with the gabled design and red brick evident within the pre-existing architectural context from their immediate context to the west, but would still adopt an appearance that would not adversely juxtapose their heritage context.

7.86. It should be noted that the PPG makes clear that the delivery of development within the setting of heritage assets has the potential to make a positive contribution to, or better reveal, the significance of that asset. It is considered that the proposals would remove those structures that do not make a positive contribution and add development which would cause no harm to the setting of the house and the registered park and garden.

Statutory Listed Structures

7.87. With regard to the statutory listed structures within the grounds of Caversham Park, (Entrance Gates and Gate Piers to Caversham Park; Inner Park Walls at Caversham Park; Temple to West of Caversham Park; Walls at Former Kitchen Garden at Caversham Park), the Heritage Statement judges that there will be no harm to any of these structures as a result of the proposals. With the exception of the Walls at the Former Kitchen Garden, the setting of which is already compromised, the settings of these structures, while it will change, will not hinder the ability to read them within their landscape context. Despite the proximity of the Grade II listed Temple to the Peppard Road development and Care Home, the walkway and woodland surrounding it, factors which inform its significance as a landscape feature, binding it to the house, will remain unaltered.

Open Spaces & Landscape Views

7.88. The proposed development is also respectful to the pre-existing green open spaces within the Site, particularly through the entire retention of the woodland throughout Caversham Park. Whilst the western parcel development and the eastern parcel development would be sited on land which is considered undesignated open space, these areas of land are both currently private and serves no purpose, as such in its present state it cannot be said to be used or enjoyed. It should also be factored into consideration that the proposals are assessed to be contextually appropriate to the setting of the heritage assets, namely the Registered Park and Garden that form part of this open space by means of their inter-visibility, scale, massing and high quality design.

7.89. The Landscape & Visual Appraisal concludes that there will be no notable change to the existing views. The proposed development is very mindful of the registered park and garden and seeks to conserve this landscaped significance and has sited and located the development sensitively, where it surrounds Caversham Park House at the top of the plateau leaving the parkland setting, open and undeveloped whilst maintaining the significant views from it. Overall, it is considered that the existing screening provided by the vegetated setting, will almost entirely screen the proposed development will and the important views from the A329 (M) identified in Policy EN5 of the RBLP will be retained. Additionally, the development takes into account the important historic context and ensures that this is protected.

Summary

7.90. The Heritage Statement outlines that whilst the setting of the park and garden would change, its overall legibility as an historic landscape would not be adversely altered as the features most specific to informing this, factoring in the listed ancillary structures, would be retained in their entirety. As outlined in the Heritage Statement, if that change is said to amount to '*less than substantial harm'*, that harm needs to be weighed against the benefits of the proposal, as required by paragraph 202 of the Framework and Policy EN1 of the RBLP, which states 'any harm or loss of a heritage should require clear and convincing justification, usually in the form of public benefits'.

Public Benefits

7.91. If it is perceived that there is some 'less than substantial harm' identified by the development and its impact to the setting of the registered park and garden, this harm would be minimal and would be more than outweighed by the many public benefits the application proposes.

7.92. The public benefits can be identified as follows;

- The retention, refurbishment and re-use of Caversham Park House and its registered park and gardens (Grade II Listed)
- Removal of twentieth century urban development
- The provision of special care housing in a situation of critical shortage
- The consequent release of existing housing stock
- The provision of 30% affordable housing
- The beneficial use of Caversham Park to the wider community
- Enhanced landscaping
- Employment provision

7.93. Each of these are examined in turn.

Retention, refurbishment and re-use of Caversham Park

7.94. The proposed residential development will provide very substantial public benefits by repairing and refurbishing the Grade II Listed Building and the conversion of the curtilage listed structures, also comprising of Nos. 1 and 3 Caversham Park Drive, which will be preserved and re-used. These proposals will bring these Listed Buildings back into an optimal condition as well as securing their future for the long term.

7.95. It is essential that the listed buildings and wider estate should have a viable use in the future, to ensure that they will be maintained to a suitable standard. The house and its grounds have been used by the BBC as its Monitoring Station since 1943 for broadcasting services and other related actively, although in recent years their operations have been winding down on Site. It is critical that a new and viable use is established to protect the significance of this building, secure its future maintenance and restoration of original features, such as the chapel roof and re-exposing of original plasterwork. As part of the proposals, not only will the Grade II listed heritage assets be preserved, in accordance with local policy and the Framework, they will be put to a use viable with their conservation that will sustain a future use and secure a community benefit through the provision of living units, comprising both affordable housing and Assisted Living Units and providing access into the parkland. Subsequently the Grade II listed Caversham Park House and its registered park and garden will be given a beneficial use.

7.96. In this regard the PPG reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. It also states that conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation.

7.97. The proposed use would also lead to the future maintenance of the heritage assets within the site, and the wider estate including its open areas and provide an incentive of the maintenance of the Site. With regard to the remainder of the park and gardens, the Applicant recognises the great importance of this matter, and is keen to ensure that suitable arrangements are put in place.

7.98. The registered park and garden will retain the features that contribute to its special interest despite the change in setting as a result of the proposals: this is to say that the park is understood principally through the surviving features of the eighteenth and nineteenth century landscape, the surviving portion of which is located to the south-east, factoring in the remains of the canals and listed structures. The proposed development will also not restrict the ability to understand or appreciate the value of heritage assets within the site, including the entrance gates and piers to Caversham Park, Inner Park Walls at Caversham Park Temple to west of Caversham Park, walls at Former Kitchen Garden at Caversham Park and curtilage listed buildings. The curtilage listed structures, to comprise Nos. 1 and 3 Caversham Park Drive, will be preserved and re-used. Overall, this historic- architectural setting will be maintained and the legibility of the park and garden subsequently unaffected.

7.99. Overall, the proposed development will be a viable future long term use which will be sustained. Areas of historic-architectural importance within the Grade II Listed Caversham Park House will be restored and subsequently preserved, constituting a heritage benefit and is considered a significant beneficial effect.

Removal of twentieth century urban development

7.100. The Site contains various structures and hardstanding, namely satellite dishes, twentieth century extensions and car parks which have resulted in the disruption of the legibility of both the building and its immediate as well as extended setting. These later editions will be removed, which will vastly improve the character and appearance of the estate as a whole and better reveal and enhance the significance of Caversham Park and the registered park and garden. This will only serve to significantly benefit the Site *and* its historic significance.

Special Care Housing

7.101. The need for this development is detailed at paragraph 7.24 in detail along with the Housing Needs Assessment prepared by Three Dragons. Paragraph 60 of the Framework seeks to support the Government's objective of significantly boosting the supply of homes. In order to achieve this, the Framework notes that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without delay.

7.102. The proposal includes the provision of much needed specialist housing for vulnerable people, which is woefully inadequate both nationally and locally. National Guidance advises that the need to provide specialty housing for older people is 'critical'. A key fact noted in the RBLP is an ageing population with growth forecast in Reading for those over 65 expected to increase by more than 60% to 2036. The RBLP outlines that there is a need for 253 additional residential care bedspaces in Reading and a need for specialist accommodation for older people. The proposed development will significantly help towards this need by providing a 64 x bed Care Home, 64 Assisted Living Units, 61 age restricted retirement dwellings, 5 market dwellings and 28 affordable dwellings.

7.103. The Berkshire Strategic Housing Market Assessment (SHMA) 2016 found that in Reading Borough itself the population aged over 65 years is expected to increase by 63.5% and for the 85+ cohort the increase is 130.6%. Alongside this there is a projected increase of 86.9% in those with dementia and 78.1% in people with mobility difficulties. The SHMA found a need for between 1,188 and 1,191 units of speciality accommodation for older people in Reading to be provided between 2013 and 2036. The proportion of these to be specialist homes in the market sector is identified at 63% or 997 units.

7.104. Local Plan Policy H6: Accommodation for Vulnerable People, sets out provision for care home beds and outlines that '*other special accommodation for vulnerable people will address the identified needs, which are primarily for accommodation that enables occupants to live as independently as possible, particularly for older people and people with physical disabilities'.*

7.105. The accompanying Housing Need's Assessment by Three Dragons outlines that there is a shortage of speciality older persons' housing for sale in the RBC area. Looking at demand in 2025, the earliest date when this development is likely to be on sale and using the Retirement Housing Group (RHG) Model, which produces results broadly comparable to the modelling approach taken from the SHMA, it concludes that at district level the RHG Model suggest a need for 144 units of sheltered housing for sale or shared equity and 197 extra care units for sale or shared equity. Looking just at the Caversham area, the RHG Model indicates a need for 67 units of sheltered housing for sale or shared equity and 78 Extra Care units for sale of shared equity are required. We are not aware of any applications for retirement housing schemes currently under consideration or coming forward in Reading or Caversham. It is therefore clear that there is a latent demand in the area for this type of development.

7.106. The proposed development would deliver a mix of housing types including Assisted Living Units, a Care Home and retirement housing, which will significantly boost the supply of homes for older people and those needing care, where there is a specific need of this type of housing compared to open market housing and would help to meet the Council's requirements including those set out in policy H6.

7.107. There can be no doubt that the development will make a very significant contribution towards meeting the local need posed by the ageing population and significant weight should be given to this issue.

Release of Existing Housing Stock

7.108. Part of the demand for specialist housing arises from a desire by elderly people to downsize from larger family houses. One very positive effect of providing specialist accommodation is that larger family accommodation is released back into the market and contributes generally to boosting the supply of housing.

7.109. Regardless of whether a five year housing land supply can be demonstrated by Reading Borough Council, any increase in housing availability within one of the last affordable areas of the country is of benefit and the provision of further housing, which is in accordance with its spatial strategy, is of significance.

Provision of 30% Affordable Housing

7.110. The proposals will provide policy compliant affordable housing (30%) which would enable a much needed part of the community to obtain an affordable home. The Affordable Housing SPD outlines that one of the biggest issues that Reading faces is ensuring that there is sufficient access to decent and affordable housing to meet needs. The SPD continues to outline that 'this presents a challenge across the country, but it is a particular difficulty in areas of economic success such as the Thames Valley, where house prices are high and there is significant demand for new homes'. The Annual Monitoring Report outlines that '*there is a continued very substantial need to secure additional affordable housing'*. It is very apparent that there is a clear shortage of affordable housing both nationally and locally and therefore the delivery of up to 28 affordable homes in this location provides significant weight in support of this proposal.

Use of Caversham Park to the wider Community

7.111. Policies CA2 and EN8 of the RBLP require that any development or conversion proposals should open as much of the park as possible up to public access and replacement open space is provided respectively.

7.112. As part of the proposed development the applicant will introduce a circular path that will connect with Caversham Park Drive and will be accessible to members of the public from dusk to dawn, allowing entry to an area that currently has no access. Use of the facilities on site either side of dusk to dawn will be by appointment / booking only. Additionally, it is proposed that the Cricket Pavilion will be extended to accommodate a small studio/meeting room and a café and that the current Cricket Pitch will be replaced with 2 no. croquet lawns and 2 no. Bowling Greens and an additional Tennis Court as well as the existing refurbished tennis court, all of which will be available for both the use of residents and the local community. There is the possibility of a future third croquet lawn, which will give the club an opportunity to grow. Additionally, the enhanced pavilion will be available for local meetings / clubs via a booking service. These provisions will clearly provide a significant benefit to the local community and these recreational benefits go beyond the requirements of policies CA2 and EN8 of the RBLP.

7.113. The proposed communal facilities as part of the scheme will also have the added benefit of drawing the wider community together, creating social cohesion, which adds further weight to this benefit.

Enhanced Landscaping

7.114. The wider estate will be significantly improved through the removal of existing car parks and the introduction of new hard and soft landscaping and a number of measures that will better reveal and enhance the significance of the Site. Additionally, the current surfacing of the driveway and car park, which is not sympathetic to the property, will be improved with a more suitable material, which can be agreed with officers during the course of the application, which will enhance the setting of Caversham Park House. Additional planting is proposed around the eastern and western parcels of development and which will help to mitigate any intrusion of development into the openness of the Site. Overtime, it will become an attractive feature in its own right which will deserve recognition as such.

7.115. The proposed development will also provide significant biodiversity enhancements, above and beyond that required in the NPPF and the RBLP. Key features include the;

- creation of extensive areas of wildflower meadow and management of existing woodlands to encourage understorey species, restore and replant the existing orchard area;
- retain important parkland trees and supplement these with new groups of native parkland species around the edges of the current cricket square;
- restore and replant the existing orchard area;
- new housing will include small open spaces, including a small play area (LAP) and extensive opportunities for formal shrub and hedgerow planting; and
- the northern entrance to Caversham Park House and its associated parking areas would be rationalised and softened with new lawns, shrub planting and hedgerows.

Employment Provision

7.116. There will be employment created during the period of construction of the development and jobs created in the Care Home once completed. The Framework at paragraph 81 advises that significant weight should be placed on the needs to support economic growth and productivity. Additionally new residents of the Site will contribute to additional local spending and will utilise and support local services and facilities helping to ensure their viability and their continued existing.

Conclusion

7.117. Overall, the above section has demonstrated that the Heritage Statement has justified that the proposed development at Caversham Park will not have an adverse impact upon the Grade II listed heritage assets, that the proposals are in keeping with Policy CA2 which directly addresses heritage / planning issues relating to the future use of Caversham Park and that the development proposals are appropriate to the design guidance and policies outlined within policies CA2, EN1, EN6, CC7 and H2 of the RBLP.

7.118. Additionally, if it is perceived that there is some 'less than substantial harm' caused to the setting of the registered park and garden, this is clearly outweighed by the public benefits of the proposal and should not pose a restriction to development.

7.119. Overall, it is concluded that the proposals would cause no harm to the significance of the Grade II listed heritage assets for consideration by means of a change in their setting or any perceived damage to historic fabric.

7.120. This is due to the changes being focused on reconfiguring / removing areas of fabric that do not contribute to the special interest of the Grade II listed Caversham Park House and where any loss of historic fabric occurs this is clearly justified by the public benefits of the scheme, namely an appropriate re-use of a listed building. While the setting of the park and garden would change, its overall legibility as an historic landscape would not be adversely altered as the features most specific to informing this, factoring in the listed ancillary structures, would be retained in their entirety.

Landscape Considerations

7.121. Policies EN1, EN5, EN13 of the RBLP are permissive of development providing it demonstrates through an appropriate assessment that the proposals do not harm the historical landscape significance.

7.122. The Site's location, topography and historic development mean that the landscape within the Site and beyond makes a significant contribution to the appearance of the area and provides important views. This is reflected by Policy EN5 of the RBLP which outlines that new development should not harm and where possible should make a positive contribution to views of acknowledged historical significance. In particular it highlights View 8, 'Views towards Caversham Park House from the A329(M), railway and surrounding streets'. Additionally Policy CA2: Caversham Park is of relevance. Policy CA2 is also of particular relevance which requires development to not detract from the character or appearance of the important landscape.

7.123. Landscape considerations are set out in further detail within the accompanying Landscape & Visual Appraisal which explains that the proposed housing to the west and east of Caversham Park House are both centred on areas that do not have a strong historic character. The area to the west has no direct visual connectivity with Caversham Park House. The proposed Care Home will result in the loss of approximately half a dozen trees, which will be compensated for. The proposed development limits change to the grounds and parkland to the south of Caversham Park House and respects the alignment of the existing terrace / axis in the development area to the west of the housing in future planting proposals.

7.124. The grounds of the Care Home have been carefully designed to retain all other existing trees as well as provide a green setting to the new building, including lawns, ornamental shrub areas and private patio spaces. The conversion of Caversham Park House will provide significant enhancements to the grounds to the north which will include: the rationalisation of parking areas and removal of cycle stores and late twentieth century shrub and tree planting, and replacement with new tree planting and evergreen hedgerows, the resurfacing of the parking areas, the removal of hard standing and late twentieth century shrub beds; and the creation of a new courtyard garden at the western end of the house.

7.125. Additionally, the new housing to the east of Caversham Park House will allow the rationalisation and removal of the large car park that currently occupies this area. The proposal will also enhance biodiversity through the creation of extensive areas of wildflower meadows and management of existing woodlands to encourage understorey species. Important parkland trees will be retained and supplemented with new groups of native parkland species around the edges of the current cricket square.

7.126. Whilst the cricket pitches will no longer be in use, the area of open grass would continue to form an integral part of the parkland setting, incorporating bowling and croquet leisure opportunities for residents.

7.127. With regard to the visual context, whilst Caversham Park House is a prominent local landmark, occupying an elevated position to the north of Reading, the mature woodlands within its grounds provide good screening to all of the proposed areas for development when viewed from the south. All areas of the site currently benefit from a mature vegetated setting which screens views from the wider area.

7.128. Policy EN5: Protection of Significant Views with Heritage Interest is applicable and states that new development should not harm and where possible should make a positive contribution to views of acknowledged historical significance.

7.129. To the west, the built form of Peppard Road, and existing woodland and hedgerows within the site provide screening to all of the proposed development areas expect the western development parcel. This western parcel of development will only be seen through glimpses between trees from Peppard Road, however given the built context and retained boundary hedgerow frontage, the proposed buildings would integrated well with the existing views of the street and would not result in a significant adverse effect on either uses or residents of the street.

7.130. To the north of Caversham Park, there are glimpsed views of the Park from Lowfield Road, however the dense boundary vegetation and trees within the parkland would screen views of the proposed area of development from here.

7.131. To the east of the Site, there are extensive areas of woodland tree planting which provide a good degree of screening, allowing only glimpses into the parkland from the public highway. Adjacent to the proposed development area to the north east of Caversham Park House it is likely that there will glimpses in the winter months from a very short stretch of Lowfield Road. However, they will not form a dominant element in the view are likely to have a negligible adverse effect.

7.132. The Landscape & Visual Appraisal concludes that there will be no notable change to the existing views. The proposed development is very mindful of the registered park and garden and seeks to conserve this landscaped significance and has sited and located the development sensitively, where it surrounds Caversham Park House at the top of the plateau leaving the parkland setting, open and undeveloped whilst maintaining the significant views from it. Overall, it is considered that the existing screening provided by the vegetated setting, will almost entirely screen the proposed development will and the important views from the A329 (M) identified in Policy EN5 of the RBLP will be retained. Additionally, the development takes into account the important historic context and ensures that this is protected.

7.133. Accordingly, the proposal complies with policies EN1, EN5, EN13 and CA2 of the RBLP along with the Framework.

Soft and Hard Landscaping

7.134. Detailed soft and hard landscaping proposals will seek to enhance the proposed development and create a visually attractive setting and have been designed to respond positively to the local context and create or reinforce local character and distinctiveness of the location whilst protecting and enhancing the historic environment. Hedged frontage boundaries are proposed to reflect and emphasise the change in built character and density across the Site. Additionally, a palette of complementary hard surface materials is proposed to provide transition from standard highway through to low key shared surface courtyard and amenity path links.

7.135. The relationship between landscape and buildings will support the concept of active frontages as well as passive surveillance to promote a convivial and safe environment and routes. Gaps between buildings will provide informal views through the site, with a core of domestic scale tree planting proposed through back garden areas to promote a village character, provide a landscape setting for the development and, a connection with the surrounding context.

7.136. The landscape proposals will support ecological value through retention and provision of a range of native planting to the Green and planted links through housing areas to promote habitat and wildlife corridor opportunities. Provision of additional nesting boxes can offer further habitat enhancements for insects, bird and bats.

Housing Mix and Type

7.137. The application proposals would provide a mix of types of residential accommodation, which would include both apartments and houses, conversions and new builds. They would also provide a range of sizes from 1-3 bedrooms. This range would be responsive to the needs of the local market. It would also help to provide more of a mixed community within the estate that might otherwise be the case.

7.138. Paragraph 62 of the Framework highlights that policies should reflect the size, type and tenure of housing required by different groups in the community. In terms of the appropriate mix requirements, Policy H2 states that; '*As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations'.*

7.139. It is noted that the supporting text to the policy highlights an onus on sites outside the town centre to deliver a substantial amount of family housing. A total of 36 of the proposed houses would be in the form of 3 x bed houses. However, the proposed development, including the Care Home, Assisted Living Units and speciality retirement housing, would release existing under occupied family housing units elsewhere in the local market because part of the demand for extra care housing arises from a desire by elderly people to downsize from larger family houses. The effect of providing such accommodation is that larger family accommodation is released back into the market.

7.140. Meeting the specific needs of the older person means a particular type of product, and this is Beechcroft's area of expertise. Specifically, occupants of retirement housing prefer traditional design and demand above average internal space as this enable them to keep traditional / sentimental pieces of larger furniture when they downsize. The proposed mix and type of housing is clearly in accordance with Policy H2 and, in line with that policy provides a large number of larger homes in this out of town location. The proposal will help to make a positive contribution towards the social objective of sustainable development, set out at paragraph 8 of the Framework. This requires that new development should create strong, healthy communities with a sufficient number and range of homes, to meet the needs of both the present and future generations. This objective also requires well designed built environments, which would also be the case.

7.141. The proposed scheme is therefore in accordance with the Framework and Policy H2 of the RBLP as it will provide a good mix of units and enhance the range of homes available locally.

Affordable Housing

7.142. The proposed development incorporates 30% affordable housing provision in line with local plan policy requirements stated in Policy H3 of the RBLP which requires that on sites of 10 or more dwellings, 30% the total dwellings will be in the form of affordable housing. This is further supported by the Council's Affordable Housing SPD, which as referenced above, '*presents a challenge across the country, but it is a particular difficulty in areas of economic success such as the Thames Valley, where house prices are high and there is significant demand for new homes'*.

7.143. The Assisted Living Units and Care Home both fall within Class C2 as described above. To summarise, the Assisted Living Units will provide a collection of a number of units, whereby the occupation of which are restricted and which the occupants will have access to communal facilities, and which required occupants to have a level of care need; hence the C2 classification. This is a view that is akin to an appeal decision on a site in Lower Shiplake – reference APP/Q3115/W/19/3220425, where that Inspector had accepted the description of the development as 'apartments and cottages' but concluded that they were not 'dwellings' due to the communal facilities and care provision and so the Affordable Housing policy did not apply. Therefore, there is no obligation to provide affordable housing in accordance with the Affordable Housing SPD which outlines that the policy will not be applied to student accommodation, or residential care or other specifically provision falling within the C2 use class or proposals for serviced apartments.

7.144. The proposed development meets the requirements of Policy H2 and the Affordable Housing SPD and provides 30% affordable housing provision which will make an excellent contribution to the delivery of much needed affordable housing which will be available to meet the needs of local households who cannot afford to buy or rent on the open market.

7.145. The Affordable Housing SPD outlines that '*in general, of the onsite affordable housing provided to comply with policy H3, the tenure split will be as follows:*

- *Affordable rented accommodation at 'Reading affordable rent' levels– at least 62%; and*
- *Affordable home ownership (shared ownership or another product) – maximum of 38%, of which the NPPF (paragraph 64) sets a minimum requirement of 10%*'.

7.146. The applicant is willing to agree an appropriate tenure mix with RBC during the consideration of the application.

Open Space and Amenity Space

7.147. Saved policies EN9 and EN10 of the RBLP relate to open space provision. Policy EN9 requires that on sites of 50 dwellings or more, new provision of open space will be sought. Policy EN10 identifies that in areas with relatively poor access to open space facilities, new development should make provision for this.

7.148. The proposed western parcel of development will provide 28 affordable houses (30% of the total new homes). This area will include a small play area (LAP), meeting this requirement.

7.149. The remainder of the development is for retirement housing and as such will not increase the demand for play areas. As such, it is not considered that on-site play space is required. Nevertheless, the Site encompasses Caversham Park, which, once developed will be accessible to both future residents and the wider community on a controlled basis. As part of the proposed development the applicant will introduce a circular path that will connect with Caversham Park Drive that will be accessible to residents and members of the public on a controlled basis. Additionally, it is proposed that the Cricket Pavilion will be extended to accommodate a small studio / meeting room and a café and that the current Cricket Pitch will be replaced with 2 no. croquet lawns and 2 no. Bowling Greens and an additional Tennis Court, all of which will be available for both the use of residents and the local community.

7.150. The proposed development also provides attractive, private, useable communal amenity spaces to the rear of the apartment block, with some private, useable amenity spaces in the form of private terraces for 2 ground floor flats in Block 1. The communal amenity spaces will be subject to natural surveillance and will be highly landscaped as set out in the accompanying Landscape & Visual Appraisal, therefore providing a high quality environment which will be attractive to residents.

7.151. Additionally, private garden sizes for dwellings are commensurate with the size of the dwelling, with communal areas provided for the Care Home and Assisted Living Units. Furthermore, the parkland of Caversham Park would be accessible and open to residents thereby providing an acceptable standard of external amenity space.

Impact on Residential Amenity

7.152. The development has been carefully designed to respect the amenity of the neighbouring properties, in particular those accessed from Caversham Park Drive, which are the closest to this development. Substantial separation distances have been provided between the proposed residential to existing residential properties.

7.153. Additionally, the proposed development has been designed so that there is sufficient distance between the proposed developments to ensure a suitable standard of residential amenity is provided for the occupiers of the proposed development.

7.154. The proposed residential units meet the Technical Housing Standards - nationally described space standards, and would ensure an acceptable internal living space for future occupants.

7.155. As such, the proposed development is considered to not have any impact upon the amenities of the adjacent residential properties in line with Policies CC8, which outlines that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties. Additionally, Policies EN9 and EN10 of the RBLP are met.

Noise and Vibration

7.156. Paragraph 180 of the Framework states that new development should avoid giving rise to adverse noise impacts on the Site and surrounding area. Policy EN17 of the RBLP requires that noise generating equipment is proposed, it must be at least 10dBA below the existing background level as measured at the nearest sensitive receptor.

7.157. The Site is in an area where the background noise levels are principally characterised by road traffic. However, the proposed development is not considered to result in traffic increases which would materially alter background noise levels. Given its location within a predominantly residential area the site is considered to be suitable for the proposed development and reasonable acoustic conditions for future occupants will be maintained. Furthermore, with the introduction of new buildings and modern building materials, improvements to internal noise conditions may be achieved. With appropriate standard mitigation employed, where necessary, to ensure future amenity, no significant effects are likely.

7.158. During the demolition and construction phases, construction traffic and machinery will generate new sources of noise and vibration. The closest noise sensitive receptors to the site are residential properties within the surrounding area, in particular residential properties on Peppard Road to the west. These are considered a reasonable distance from the proposed development so as to cause no undue detrimental impact. Nevertheless, it is envisaged that direct and indirect impacts arising from the proposed development would be controlled through the implementation of a Construction Environmental Management Plan (CEMP) subject to planning condition, whose purpose would be to reduce the risk of adverse impact of construction on sensitive environmental resources and to minimise disturbance to local residents and workers throughout the demolition and construction work.

7.159. The proposals therefore accord with national and local policy and guidance with regard to the control and mitigation of adverse noise and vibration generation from the construction of the Site, as well as the longer term use of the Site for residential purposes.

Biodiversity

7.160. An Ecological Appraisal has been prepared by Aspect Ecology and accompanies this planning application. It has been informed by various ecological surveys undertaken in 2018 and November 2021 based on standard extended Phase 1 methodology. In addition, a general appraisal of faunal species was undertaken to record the potential presences of any protected, rare or notable species, with specific surveys conducted in respect of bats, badgers, great crested newts and reptiles.

7.161. There are no designated ecological conservation sites within or in proximity to the Site. The closest designated site is Clayfield Copse Local Nature Reserve located approximately 0.3km northeast of the Site. All of the ecological designations in the surrounding area are physically well removed and separated from the site by existing residential development and are therefore unlikely to be adversely affected by the proposals.

7.162. The Phase I habitat survey has confirmed that the woodland, veteran trees orchard, tree/scrub/grassland mosaic and hedgerows are features of ecological importance however these habitats are primarily retained under the proposals and provide a number of opportunities for their enhancement. Areas of scattered scrub, amenity planted spaces and sections of hardstanding present on site are unlikely to pose a significant constraint to development.

7.163. The detailed survey work has recorded protected species to be largely absent from the site, although there is the potential for bats to utilise onsite tree for roosting. A number of mitigation measures have been proposed to minimise the risk of harm to protected species, with compensatory measures proposed where appropriate in order to maintain the conservation status of local populations.

7.164. These mitigation measures comprise:

- Hedgerow and Tree Protection - All hedgerows and trees to be retained within the Proposed Development shall be protected during construction in line with standard arboriculturist best practice (BS5837:2012) or as otherwise directed by a suitably competent arboriculturist;
- Woodland Protective Fencing along residential curtilages;
- Provision of New Compensatory Wildflower Grassland - retained areas of grassland throughout the Site are enhanced in order to provide substantial new areas of wildflower grassland;
- Pollution Prevention safeguards including locating hazardous material containers away from watercourses, water washing of vehicles and allocating a refuelling area which is impermeable and away from the watercourse;
- Invasive Species Safeguards;
- Sensitive Lighting measures including light exclusion zones and light barriers;
- Badger Construction Safeguards;
- Hedgehog Safeguards; and
- Timing of Works to avoid bird nesting season.

7.165. Overall, the proposed development has sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is considered unlikely that the proposals will result in significant harm. On this basis, the proposal is found to comply with the objectives for protecting, conserving and enhancing biodiversity and features of ecological importance set out within both the Framework and Policy EN12 of the RBLP which requires development proposals to ensure significant harm to biodiversity and / or geodiversity can be avoided or adequately mitigated.

7.166. A Biodiversity Net Gain assessment has been carried out by Aspect Ecology and their report should be referred to for the details.

Access and Highways

7.167. Section 9 of the Framework identifies the importance of promoting sustainable transport, through careful consideration of transport issues throughout the plan-making and development process, as well as ensuring that any potential impacts on existing transport networks are mitigated against, whilst promoting sustainable modes of transport such as walking, cycling and public transport. The environmental impacts of traffic and transport infrastructure, must also be identified, assessed and taken into account.

Access Arrangements

7.168. The planning application is accompanied by a Transport Statement, Travel Plan and Construction Traffic Management Plan which have been prepared by Glanville Consultants.

7.169. The Site has a singular vehicular access from Peppard Road via the main gates, which leads onto Caversham Park Drive, which is a private drive within the Site and will be retained in private ownership, maintained by a management company. Access to Caversham Park will remain unaltered. The security barriers will be removed to preserve an access road typically 5m, wide. The gateway will be retained creating a localised pinch point that will preserve the informal priority working arrangement.

7.170. The Transport Assessment concludes that a review of the accident record shows that the streets surrounding the Site do not suffer from any existing safety concerns.

7.171. The proposed development will result in a relatively modest level of traffic generation. However, the overall scale and nature of the proposed development will result in an overall net reduction in traffic, compared to the extant office use of Caversham Park. Accordingly, no significant adverse effects on traffic or transport are likely to result. It is concluded that the development proposed will not have a detrimental impact on highway safety and the transport impacts cannot be regarded as severe or harmful.

Travel Plan

7.172. In addition to the Transport Assessment a Framework Travel Plan has also been produced in line with Policy TR1 of the RBLP which details Travel Plan objectives, measures and initiatives, targets. The Travel Plan will be an important tool in assisting the aspirations of the Applicant of reducing the transport related environmental impacts of the development. The initiatives and travel management mechanisms proposed within the Travel Plan includes: appointment of a Travel Plan Co-ordinator; provision of travel information, promotion of walking, cycling and public transport as feasible and realistic alternatives to the private car where appropriate; and promotion of car sharing schemes and offering alternatives to reduce the needs to own a private car.

Construction Traffic Management Plan

7.173. The Construction Traffic Management Plan (CTMP) provides information in respect of the anticipated routing and parking of construction vehicles, as well as the loading and unloading of materials. It sets out measures to safeguard the immediate highway and reduce the number of vehicles accessing the Site during demolition and construction phases. In conclusion, it demonstrates that construction and on site activities will be appropriately managed throughout the construction phase of development.

7.174. The main matters set out in the CTMP are:

- Vehicles will be routed so as to minimise the impact on sensitive receptors such as local schools and villages.
- The Site Manager will oversee all construction activities undertaken at the Site.
- Appropriate signage, which accords with the necessary standards and requirements of the Highway Authority, will be provided around the Site during construction.
- Management measures such as vehicle wheel washing upon exit will be implemented to prevent dust and debris from construction activities on the public highway.
- A temporary car park will be provided on Site for construction staff using private vehicles.

Parking *Arrangements*

7.175. The proposed development has been designed in accordance with the Council's car parking standards, which are set out in their Supplementary Planning Guidance and which are noted in the Transport Statement.

7.176. A total of 292 parking spaces are provided for the proposed development. This includes;

- 101 parking spaces for the Assisted Living Units;
- 92 parking spaces for the Eastern parcel of development;
- 7 parking spaces for the Gate Houses;
- 29 parking spaces for the Care Home; and
- 63 parking spaces for the Western parcel of development.

7.177. The proposed market dwellings and affordable dwellings meet the Council's maximum standards.

7.178. The Council's parking standards for a retirement village require that this is to be determined separately. In this instance, the retirement housing has been compared to the maximum level of car parking that would be required for conventional residential development, in order to provide a maximum benchmark for the required amount of car parking.

7.179. The 64 Assisted Living Units and 61 specialist housing provides 193 spaces together which is a level of car parking slightly below the maximum standard for a conventional residential development – 222 parking spaces. In this case the Assisted Living Units and specialist housing is occupied by one or two people, with each household typically requiring only one car. Furthermore, Caversham House is located approximately 300m from Peppard Road, with the land to east being over 500m from Peppard Road. As such these parts of the development are well beyond the 200m that residents would normally walk from a car parking space to their house. On this basis the residents of and visitors to this component of the development would be very unlikely to part on the streets surrounding the site. The amount of parking for this part of the development is therefore sufficient for this development, in line with the Council's parking standards.

7.180. Parking standards for a C2 Care Home require 1 space per Full time staff and 1 space per 4 residents. The provision of 29 parking spaces have been provided for the Care Home, which is in response to the well established needs to the Care Home and will be sufficient to ensure that all of the associated parking demands can be met within the curtilage of the Care Home. The arrangement of the Care Home has been developed by an architect working directly for the future operation of the facility. The operator is well incentivised to ensure they have adequate spaces.

7.181. It is anticipated that the Care Home would have 24 staff on Site from 9am to 4pm, with a brief 'blip; to around 27 staff around the 2pm shift change depending on handovers. Based on analysis of existing staff travel arrangements, the operators expect the number of staff arriving by car to peak at 20 during the 2pm shift change. There are usually at least a couple of those having shared a car, putting the maximum number of staff cars on Site are around 18.

7.182. The proposed pavilion building and associated facilities will provide 11 car parking spaces. This part of the development is predominately for the residents of the development, nevertheless it may attract a limited number of vehicles from the surrounding area and therefore 11 parking spaces have been provided.

7.183. In addition, 10% of all the spaces will be Electric Vehicle charging spaces.

7.184. In conclusion, the development will provide an appropriate level of car parking provision, compliant with the prevailing standards. Furthermore, it has been demonstrated that the level of car parking proposed would be adequate for the future residents of, and visitors to, the development and would not result in parking on the streets surrounding the Site.

7.185. Secure and covered cycle parking provision will be provided and is detailed in the Transport Statement. The 5 market dwellings and 28 Affordable Dwellings will achieve the Council's standards, with individual cycle stores located in the rear gardens. The provision of 36 cycles parking spaces will be provided for the Care Home.

7.186. Additionally, there are no prevailing cycle parking standards for retirement dwellings, however cycle stores will be provided which will provide sufficient space to store 1 cycle per unit. An additional 1 cycle parking space per 2 units will be provided via Sheffield stands for visitors. It is proposed that the cycle stores would be provided with 50% of their total maximum cycle storage racks from day 1, and the management company will monitor the usage going forward to provide more or less racks as necessary, to allow the facilities to adapt to the demands for cycle or mobility scooter parking.

Servicing

7.187. Policy CC5 of the RBLP outlines that development should identify measures to minimise the generation of waste and to handle waste appropriately during the lifetime of a development.

7.188. The layout of the proposed scheme has been developed with careful consideration made to the servicing requirements for refuse collection and daily deliveries. The layout has been designed to allow refuse and service vehicle turning at turning heads at the end of all adopted surfaces, in accordance with Reading Borough Council's guidelines.

7.189. Waste and recycling storage will be accommodated on plot for all houses. Rear access will be provided to all rear gardens and collection will be made from the adoptable surface. All units will have satisfactory 'carry distances' in accordance with part H of the Building Regulations and the Manual for Streets.

7.190. Apartment blocks will be provided with dedicated waste and recycling stores, located to ensure that all units will have satisfactory 'carry distances' in accordance with Part H of the Building Regulations and the Manual for Streets.

7.191. The residential units and the Care Home will result in the generation of household recyclable material and some clinical waste. The nature of the proposed development is such that excessive or abnormal waste generation is unlikely to occur.

7.192. Alongside appropriate storage, this waste will be collected and managed in accordance with all relevant legislation and guidance. Following collection, the waste would be suitably disposed of or recycled by, or on behalf of, Reading Borough Council as the waste disposal authority.

7.193. The proposed Site Plan sets out the location of the refuse storage areas which would be provided for each of the proposed properties. These would be close to the routes by which refuse vehicle would travel, ensuring that carrying distances would be minimised These storage areas would be designed with the intention that they would blend in well with the character of the wider estate. It is anticipated that full details will be agreed with the Council in relation to refuse collection via a planning condition.

Air Quality

7.194. An air quality assessment has been undertake for the proposed development by Aether. The Site is not within the Borough of Reading's Air Quality Management Area. The key considerations for air quality relate to impacts on existing receptors due to emissions associated with demolition of the existing later additions to the main house and subsequent construction and operation of the new build elements of the proposed development. The other key consideration is the suitability of the site for its proposed use.

7.195. The ADMS Roads dispersion model has been used to determine the impact of emissions from road traffic on sensitive receptors. Predicted concentrations have been compared with the air quality objectives.

7.196. The results of the assessment indicate the proposed development will cause Nitrogen Dioxide and Particulate Matter concentrations to increase by 1.3µg/m3at the worst-case receptor as result of the proposed development, an increase which is considered to be of 'negligible' significance. The report concludes that no mitigation is required as the air quality objectives are predicted to be met and the impact is deemed negligible. However, the proposed development will provide secure and covered cycle storage and install electric charging points, to help reduce the emissions arising from the development. Additionally direct and indirect impacts arising from the proposed development can be controlled through the implementation of a CEMP, which can be subject to a planning condition.

7.197. Accordingly, the proposed development complies with Policy EN15 of the RBLP and the Framework.

Energy Statement

7.198. Beechcroft Homes are committed to providing developments that reduce predicted energy and CO2 requirements, supply energy efficiently, and introduce renewable energy. An Energy Strategy and Sustainability Statement has been prepared by Resi Resolve and details methods of increasing energy efficiently and incorporating sustainability initiatives into the proposed development.

7.199. The development proposals have been designed to be sustainable from the outset in compliance with the energy hierarchy. The proposals demonstrate a 36% reduction in regulated carbon dioxide emissions of the proposed development at this Site, which exceeds the 35% reduction target. The remaining carbon emissions will be achieved through off site solutions and a cash in lieu contribution to the Borough's carbon Offset Fund.

7.200. The refurbished dwellings incorporate enhanced u-values which will provide an average overall improvement of 29% against the requirements of Approved Document Part L1B of the Building Regulations. The heating and hot water specification will mirror that of the new building.

7.201. The Care Home will achieve the required BREEAM rating and the BREEAM Pre-Assessment prepared by Greenbuild Consult should be referred to for the details.

7.202. Overall, the proposed approach detailed in the Energy and Sustainability Strategy will ensure that the key sustainability polices of Reading borough Council's Local Plan will be met with consideration made to the following area of design and construction:

- Energy Efficiency Measures
- Sustainable Design and Layout
- Water Resource Management
- Material Resource Management
- Biodiversity
- Sustainable Construction and Reducing Pollution

7.203. These measures will help to reduce the carbon footprint of the development. Furthermore, the new buildings introduced will be complaint with current policies and standards in relation to energy efficiency and sustainability. The development therefore maximises opportunities for renewable and low carbon sources of energy supply in accordance with Policies CC2, CC3, CC4, CC5, EN18 and H5 of the RBLP and the Framework.

Lighting

7.204. A lighting strategy report, Reference 2208-DFL-ELG-XX-RP-EO-13001, has been prepared to develop a sensitive lighting strategy to support the redevelopment of Caversham Park. It includes all internal lighting throughout the development to be low energy models. External lighting will also be low energy and will be controlled through passive infrared (PIR) sensors or daylight cut-off devices. All external lighting will be arranged so that it is down-facing in order to reduce potential light pollution. Street lighting will use lighting columns mounted with LED's, set back a minimum of 800 mm away from the road kerb. Dwelling frontages will be fitted with façade mounted wall lights, fitted at a height not exceeding 2m. Access areas, parking bays and footways are to be fitted with illuminated bollards.

Flood Risk and Drainage

7.205. The application is supported by a Flood Risk Assessment prepared by Glanville Consultants. The Site is located within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding) and having the least likelihood of flooding. As required by the Framework, the proposed development would not increase the risk of flooding in other areas. The proposed development site is considered to be at very low risk of flooding from all sources examined.

7.206. The infiltration rates vary across the Site, meaning that runoff from only some areas of the Site could be disposed of by means of infiltration. The proposed drainage strategy has therefore been split into five sub catchments, Western, Central, Cricket Pavilion, Eastern and Existing Access Road and will offer protection against surface water flooding by providing a positive drainage system, which will intercept runoff generated within the site.

7.207. The falling head infiltration testing and groundwater monitoring results have shown that the disposal of runoff from the site by means of infiltration could be feasible for Western Catchment and Cricket pavilion Catchment, subject to further infiltration testing being carried out in accordance with BRE 365 and positive infiltration results.

7.208. Runoff from the Eastern Catchment will be discharged into the existing ditch at a controlled rate of 12..5l/s (50% betterment to existing brownfield runoff situation), which will provide significant drainage improvement whilst reducing flood risk to the Site and surrounding area.

7.209. The Central Catchment and a portion of the access road in the west of the Site will follow the existing drainage arrangement. Central Catchment will discharge runoff into the pond and runoff from the western portion of the access road will drain into the existing soakaways/ground.

7.210. The proposed drainage strategy will also provide opportunities to degrade pollutants, thereby improving the quality of surface water discharging from the site.

7.211. Overall, the proposed drainage system will offer protection against surface water flooding by providing a positive drainage statement which will intercept runoff generated within the site and will be designed to cater for the 1 in 100 year flood event plus 40% to allow for the predicted impacts of climate change over the lifetime of the development to surface water.

7.212. Based on the above, the FRA concludes that the proposed development will not be at an unacceptable risk from fluvial flooding or other sources, will not increase the risk of flooding to the Site or surrounding areas and will employ a surface water drainage strategy based on the principles of sustainable development. Therefore, the proposal is in accordance with the Framework and Policy EN18 of the RBLP, which directs development away from areas liable to flood.

Archaeology

7.213. An Archaeological Desk Based Assessment accompanies this application. The assessment confirms that further information will be required about the potential of the Site in order to draw up a scheme to mitigate the impact of development on any below-ground archaeological deposits if necessary, which can be conditioned.

7.214. As the impact of the proposed development on the archaeological potential of the Site could be adequately mitigated, and the development made acceptable with regard to any archaeological impacts, it therefore accords with the requirements in paragraph 197 of the Framework and EN2 of the RBLP.

Arboriculture

7.215. An Arboricultural Impact Assessment has been prepared to inform the development proposals. The report identifies that the Site consists of a number of trees which are a significant feature of the Site and relate to its historic Parkland setting.

7.216. The Site does contain trees to be of high value to the character and landscape value of the Site and these will be retained in situ, and the implementation of safeguards for their protection during construction will be put in place. The proposed development will retain as many of the trees on site as possible, with removal restricted to fruit and ornamental trees only, which will be more than compensated for by the additional tree planting and landscaping within the Site, to complement the retained tree stock. Those trees for removal will have a negligible effect on the Site's public amenity.

7.217. The proposals are accompanied by a scheme of landscaping and provide the opportunity to secure betterment to the tree stock particularly reinforcement of the significant retained trees alongside succession planting, servicing to complement the tree stock.

7.218. Accordingly, it is considered that the proposed development accords with policies EN14, CC3 and CA2 in addition to relevant provisions within the Framework.

Foul Drainage and Utilities Assessment

7.219. The planning application is supported by a Foul Drainage and Utilities Statement prepared by Glanville Consultants which explains that there is a good network of gas, electricity, water, foul drainage and telecommunications services on or in the vicinity of the Site, with good scope for the required connections to serve the proposed development. On this basis, the provision of new infrastructure to serve the proposals will not be a constraint to the redevelopment of the Site for residential use as proposed.

7.220. Additionally, MJA Consulting Civil and Structural Engineers have submitted a statement which outlines that Virgin Media have confirmed that they have a fibre optic network in this location and subject to an agreement they are willing to service the development with VM02 broadband speed on subscription up to 1 Gigabit.

Contaminated Land

7.221. A ground investigation has been completed at the Site to characterise the ground conditions and identify potential sources of contamination. A Site investigation report accompanies this application prepared by ST Consult.

7.222. The report outlines that potentially contaminative activates have been carried out in the Site and in the immediate surrounding area and that those contaminates may have affected the soil and groundwater. The report recommends that a site investigation is carried out to determine the risks of this development, which could be conditioned and would not preclude residential development at the site.

7.223. Accordingly, the proposed development complies with policy EN16 of the RBLP and the Framework provisions that deal with contaminated land.

Planning Obligations

7.224. In accordance with the Framework and Policy CC9 of the RBLP, the Applicant will enter into dialogue with the Council to agree a list of planning conditions and obligations in relation to necessary infrastructure provision arising from the proposed development. The agreed planning conditions will be required to meet the tests of paragraph 55 of the Framework, and the agreed planning obligations will need to meet the requirements of Regulation 122(2) of the CIL Regulations 2010 (as amended), being necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.

7.225. Site-specific infrastructure requirements are secured via a S106 agreement in line with the Planning Obligations SPD. In this regard, it is anticipated that a S106 agreement will be entered into for the proposed development to secure planning obligations relating to affordable housing and that the Care Home and Assisted Living Units has an element of care and use of a communal facility ensuring it falls within a C2 use. The Applicant will enter into further discussions with the Council as appropriate to establish the need for any additional obligations to be secured via a S106 agreement.

7.226. It is acknowledged that the adopted CIL Charging Schedule applies a CIL rate of £120/sqm for residential development in the location proposed, in order to fund local infrastructure identified within the Council's Regulation 123 List. The necessary calculation of CIL will be made at the detailed design stage.

7.227. The proposal therefore complies with Policy CC9 of the RBLP which required that development proposals should mitigate all relevant impacts on local infrastructure on order to ensure that they are sustainable.

Benefits of the Proposed Development

7.228. The above assessment of impacts has shown that no significant adverse effects are expected as a result of the development and that the proposals overall would accord with the provisions of the Development Plan, in addition to material considerations in the form of the Framework.

7.229. The benefits of the proposed development are considered to be wide-ranging and significant, supporting and delivering the objectives of the Local Plan/ Framework. These are summarised below within the context of the three aspects to sustainable development as set out within the Framework.

Economic Benefits:

- New market and affordable homes to serve identified needs for local employees and to supply further employment provision during construction, thereby meeting the needs of existing and future employers and investment.
- There will be employment created during the period of construction of the development and jobs created in the Care Home once completed.
- An increase in the population and number of economically active residents, resulting in a commensurate increase in the household expenditure within local shops and services, thereby supporting the prosperity of the local area and its amenities.
- The delivery of the development would have direct benefits to the Council and local community through the Community Infrastructure Levy (CIL) receipts and local infrastructure improvements, e.g. in healthcare provision, that this would facilitate.

Social Benefits:

- The delivery of residential and care accommodation for an ageing population to meet the needs of the present and future generations, helping to address the shortage of homes nationally and contribute towards a specific housing requirement and adopted spatial strategy, that address the SHMA, Policy H6 and frees up family housing elsewhere.

- New affordable homes in line with local policy, meeting the prevailing local housing need mix and to comprise 30% affordable.

- A choice of new high quality homes to meet local needs with each unit comfortably exceeding the nationally described space standards;

- The retention and re-use of a Grade II listed Building and Registered Park and Garden which is put to a viable use and ensuring they do not fall into a state of decline. These proposals will bring these Listed buildings back into an optimal condition as well as securing their future for the long term.

- The proposed residential use would generate significant funding required for any repairs required and also ongoing funding for future maintenance of public areas and an incentive and means for the maintenance of individual buildings.

- The proposed use will lead to the future maintenance of the heritage assets within the site, and the wider estate including its open areas and provide an incentive of the maintenance of the Site.

- The Site contains various structures and hardstanding, namely satellite dishes, twentieth century extensions and car parks which have resulted in the disruption of the legibility of both the building and significance of Caversham Park and the registered park and garden. Their removal will only serve to significantly benefit the Site and its historic significance.

- The proposed development will provide accessible services and open spaces that will support the local communities' health, social and cultural well-being. It will introduce a circular path that will connect with Caversham Park Drive and will be accessible to members of the public from dusk to dawn, allowing entry to an area that currently has no access. Use of the facilities on the site either side of dusk or dawn will be by appointment / booking only. Additionally, it is proposed that the Cricket Pavilion will be extended to accommodate a small studio/meeting room and a café and that the current Cricket Pitch will be replaced with 2 no. croquet lawns and 2 no. Bowling Greens and an additional Tennis Court along with the existing tennis court, all of which will be available for both the use of residents and the local community. There is also the possibility of a future third croquet lawn, which will give the club an opportunity to grow. This will clearly provide a significant benefit to the local community. Additionally, the enhanced pavilion will be able to be accessed for local meetings / clubs via a booking service.

- The bringing forward of land in an accessible and sustainable location, with communal facilities as part of the proposed scheme, will support the creation of a strong, vibrant and healthy community.

Environmental Benefits

- The Site and its immediate surroundings are not subject to any specific environmental designations such as Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB) or Site of Special Scientific Interest (SSSI), nor does the Site form part of the Green Belt.
- Redevelopment of the unused buildings and re-use of previously developed land.
- The wider estate will be significantly improved through the removal of existing car parks and the introduction of new hard and soft landscaping and a number of measures that will better reveal and enhance the significance of the Site. Additional planting is proposed around the eastern and western parcels of development and which will help to mitigate any intrusion of development into the openness of the Site. Overtime, it will become an attractive feature in its own right which will deserve recognition as such.
- The Site is not located within an area of Flood Risk, being within Flood Zone 1.
- The proposed development will provide biodiversity enhancements through the creation of extensive areas of wildflower meadow and management of existing woodlands to encourage understorey species, replant the existing orchard area, provision of open spaces throughout the development, new lawns, shrub parking and hedgerows and supplement existing trees.
- The provision of new usable public open space on-site.
- The retention and protection of important trees and supplement these will new groups of native parkland species around the edges of the current cricket square.
- The provision of substantial open space where no built development is proposed, to the benefit of future residents and existing residents within the local area.
- The provision of sustainable urban drainage system as a means of mitigating for the Site's impact on local drainage patterns.

The Planning Balance

7.230. The Framework policies on the delivery of sustainable housing development carry significant weight, and specific policies do not indicate that development as proposed at the Site should be restricted.

7.231. The proposed development in this location would support housing and economic development objectives and meet the aims and objectives of sustainable development, delivering planning benefits across all three strands of sustainable development (economic, social and environmental). There are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal.

7.232. Paragraph 11 of the Framework provides that development which accords with an up to date Development Plan should be approved without delay unless material considerations indicate otherwise. This is echoed in Policy CC1 of the RBLP. In this case, the development proposal clearly constitutes 'sustainable development'. As such, and for the reasons set out above, the application proposals are considered to be fully compliant with the provisions of the Development Plan and other relevant material considerations. On this basis and in accordance with S38(6) of the Planning and Compulsory Purchase Act, planning permission should be granted.

8. Summary and Conclusions

8.1. Paragraph 11 of the Framework states that development proposals that accord with an up-to-date development plan should be approved without delay unless there are material considerations which would indicate otherwise. This policy is echoed in Policy CC1 of the RBLP.

8.2. The proposed development will:

- Deliver additional residential and care accommodation to assist in meeting a specific housing requirement for Reading Borough, in particular with the delivery of much needed care home spaces that addresses the SHMA, Policy H6 and frees up family housing elsewhere.
- Contribution to the delivery of much needed affordable housing which would be available to meet the needs of local households who could not afford to buy or rent on the open market. The proposed development would result in 30% affordable properties being provided. The delivery of affordable housing in an accessible location is an important benefit of the scheme.
- As set out above, the scheme is not needed in order to secure a five year housing land supply, however it will boost the overall supply of housing in line with paragraph 59 of the Framework.
- Bring forward and make the most efficient use of previously developed land in a sustainable location.
- Provides a future use and maintenance of Caversham Park House, which is a Grade II Listed Building and registered park and garden.
- Provides the local community with controlled access to Caversham Park and amenities and facilities.

8.3. As this Statement explains, and in respect of other material considerations, as evidenced within the supporting technical document, the proposed development:

- Represents high quality design, which responds to the context and character of Caversham Park House and the registered park and garden.
- The scheme will provide employment opportunities generated in construction, spending within the construction industry supply chain and indirectly as a result if future residents contributing to the local economy. There will also be a boost to the local economy through additional spending and support for existing facilities and services.
- Will cause no adverse impact on neighbour amenities.
- Complies with the Framework in respect of flood risk.
- The proposed development through the S106 will provide adequate public open space and highway improvements.

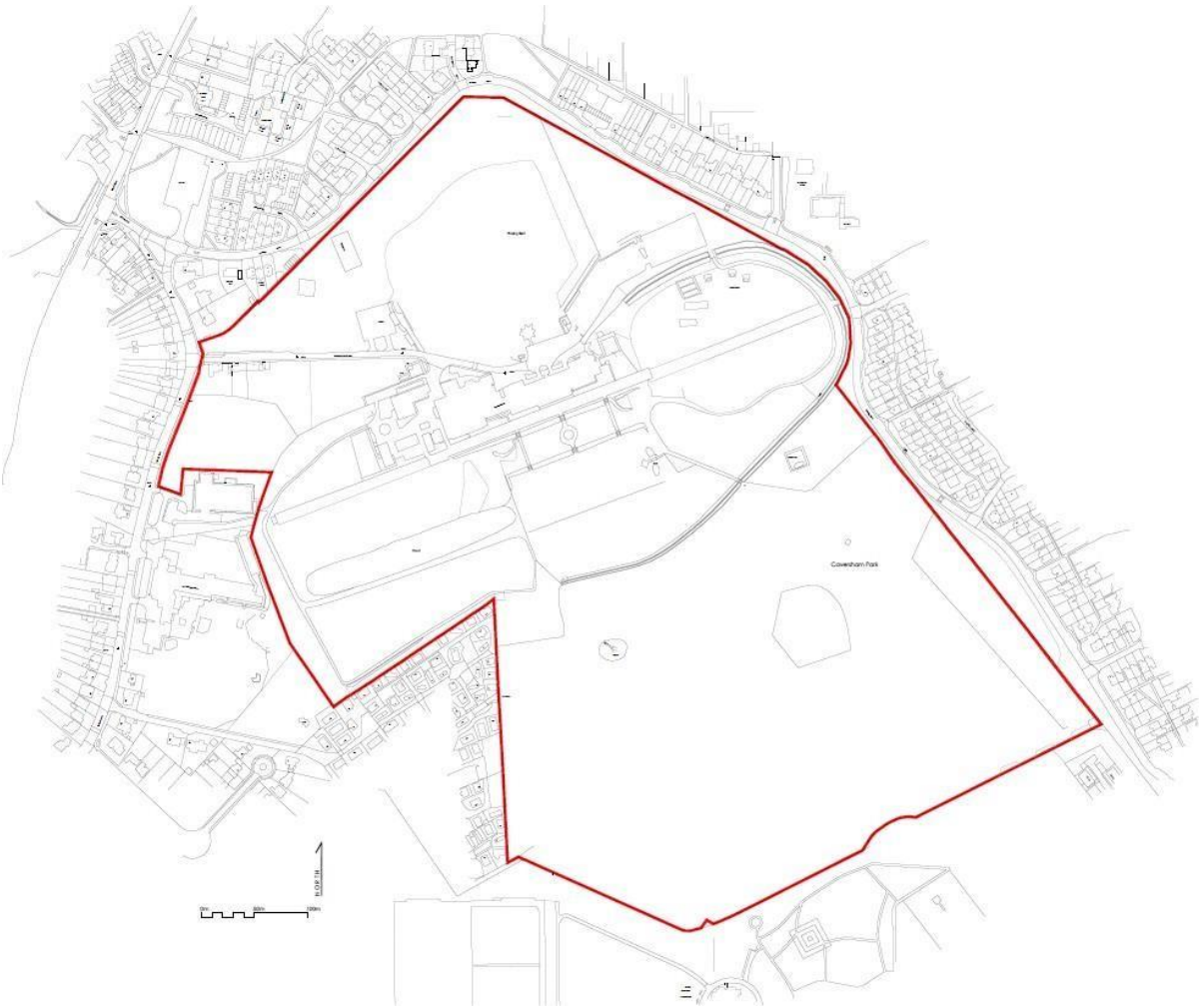
- Will not have a negative impact on archaeology.
- Will respect and conserve biodiversity within the Site and nearby.

8.4. As this Statement explains, the Framework policies on the delivery of sustainable development carry significant weight and its specific policies do not indicate that development should be restricted. Given the above, it is clear that there are no adverse impacts that would significantly and demonstrably outweigh the benefits of the scheme in providing residential development in this location, in accordance with paragraph 11 of the Framework, which is echoed in Policy CC1 of the RBLP.

8.5. As such when applying the planning balance, the proposed development is considered to be acceptable and is in accordance with the Development Plan. Therefore, this application should be approved by the Local Planning Authority without delay, in order to allow the proposed development to come forward on the site as soon as possible.

Appendices

Appendix 1 : Site Location Plan


Caversham Park

Appendix 2 : Council’s Screening response January 2022 -reference 212072

Frances Martin
Executive Director for Economic Growth and Neighbourhood Services

Civic Offices, Bridge Street,
Reading, RG1 2LU

☎ 0118 9373787

Our Ref: 212072

Direct: ☎ 0118 9372980

e-mail: stephen.vigar@reading.gov.uk

26 January 2022

Beechcroft Developments Ltd
c/o Savills
Ground Floor Hawker House
5-6 Napier Court
Napier Road
Reading
RG1 8BW

Your contact is: Steve Vigar, Planning

Dear Sir/Madam,

SCREENING OPINION ENQUIRY RESPONSE

Enquiry Reference: 212072
Address: Land at Caversham Park, Peppard Road, Caversham, Reading, RG4 8TZ
Proposal: Conversion of the main house to provide 63 assisted living apartments. Construction of a two storey 64 bedroom care home to the west of the main house following demolition of existing buildings. Conversion of the existing buildings along the access to the site to 4 houses. Erection of 33 houses on land lying outside the Historic Park and Garden boundary. Erection of 41 new houses and 12 apartments on land to the east of the main house in the area of existing car parking, hardstanding and infrastructure. Refurbishment and extension of the sports pavilion including the provision of 2 no. croquet lawns, 2 no. bowling greens and an additional tennis court.

I write in connection with your request for a Screening Opinion, submitted in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Screening Opinion
It is the Council's opinion that the proposed development of the site for employmentpurposes does not fall within Schedule 1 of the EIA Regulations.

The project does fall under Schedule 2, as an Urban Infrastructure Project and exceeds thresholds in terms of the number of dwellings (more than 150) and the site area (more than 5 hectares). The Local Planning Authority must therefore consider whether it is likely to have significant effects on the environment.

Consultation has been carried out with Historic England, Environment Agency, Gardens Trust, Berkshire Archaeology the Council's Environmental Health, Natural Environment and Transport sections, and the Lead Flood Authority. A number of representations have also been received from interested members of the public.

It is considered that the proposed development would be likely to result in significant effects on the environment by virtue of its nature, size and location due to degree of change affecting nationally designated heritage assets including the Caversham Park Registered Park and Garden and the setting of the Caversham Park (BBC Monitoring) listed building. The reasons for this are set out in more detail in the attached Screening Matrix, together with reasons why other relevant matters are not considered likely to have significant effects.

Therefore, in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the Local Planning Authority hereby adopts a positive Screening Opinion to the effect that an Environmental Statement **IS REQUIRED** to accompany any formal planning application for the development referred to above.

Please note that the advice contained within this letter is provided without prejudice to the decision of the Borough Council in the event of a formal application for planning permission.

Yours faithfully,

SDV
Steve Vigar
Principal Planning Officer

Attached: Screening Matrix
cc. Rachel Fletcher, Historic England

savills

Appendix 3 :

Council’s pre-application response 5 November 2021 – Reference 211685

Council’s pre-application response 11 February 2022 – Reference 211685

CONFIDENTIAL

Frances Martin
Executive Director for Economic Growth and Neighbourhood Services

Civic Offices, Bridge Street,
Reading, RG1 2LU

Mr P. Brown
Savills
Ground Floor Hawker House
5-6 Napier Court
Napier Road
Reading
RG1 8BW

Our Ref: 211685

Direct: 0118 9372980

e-mail: stephen.vigar@reading.gov.uk

Without Prejudice 5 November 2021

Your contact is: Steve Vigar, Planning

Dear Mr Brown,

PRE PLANNING APPLICATION ENQUIRY RESPONSE

Enquiry Reference: 211685
Address: Caversham Park, Peppard Road, Caversham, Reading, RG4 8TZ
Proposal:

Thank you for your enquiry.

Introduction
The site can be described briefly as a large, former stately home with extensive grounds located to the north of Reading Borough and surrounded by suburban development. The site has been used by BBC Monitoring since 1943 for broadcasting services and other related activity. Access is from Peppard Road to the western edge of the site with an access road leading to the main house and beyond to a large surface car park.

The site contains a number of listed buildings, most notably the main Caversham Park mansion house. The majority of the site is a Registered Park and Garden.

The site comprises a mix of formal and informal parkland surrounding the main house and is heavily treed. The topography is flatter on the higher ground to the northern end with the land sloping steeply downwards to the south of the main house.

A site visit was conducted on 18 October with representatives of the BBC, Beechcroft Homes, Reading Borough Council and Savills present.

The proposals are at an early stage of their development and are shown on submitted drawing 3251.SK11 'Colour Site Plan' dated October 2021.

It is not fully clear from the submitted details, but from discussions on site it is understood that the proposals involve:

- The retention and conversion of the main house to retirement apartments (Class C3) and associated works.
- The construction of a care home (Class C2) immediately to the west of the main house;
- Construction of a row of townhouses (C3) in place of the existing car park to the north east of the main house;
- Construction of a group of houses and flats (C3) within the clearing currently occupied by satellite dishes to the east of the main house;
- Construction of a group of houses (C3) in the enclosed field to the north of the BBC Records Centre, fronting Peppard Road and to the south of Caversham Park Drive; and
- Change of use of numbers 1 and 3 Caversham Park Drive from their existing ancillary residential use to C3 dwellings and associated works.

This scoping pre-application response is intended to form part of an initial 'feasibility stage' of the pre-application process. It is based on very limited information and, as agreed, has not been subject to any consultee involvement due to the timescales set by the prospective developer. This response is intended as a guide to inform subsequent detailed pre-application discussions. It should not be relied upon to inform an application for Planning Permission at this stage.

Reading Borough Local Plan 2019

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
CC2: SUSTAINABLE DESIGN AND CONSTRUCTION
CC3: ADAPTATION TO CLIMATE CHANGE
CC4: DECENTRALISED ENERGY
CC5: WASTE MINIMISATION AND STORAGE
CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT
CC7: DESIGN AND THE PUBLIC REALM
CC8: SAFEGUARDING AMENITY
CC9: SECURING INFRASTRUCTURE
EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT
EN2: AREAS OF ARCHAEOLOGICAL SIGNIFICANCE
EN5: PROTECTION OF SIGNIFICANT VIEWS WITH HERITAGE INTEREST
EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT
EN7: LOCAL GREEN SPACE AND PUBLIC OPEN SPACE
EN8: UNDESIGNATED OPEN SPACE
EN9: PROVISION OF OPEN SPACE
EN10: ACCESS TO OPEN SPACE
EN12: BIODIVERSITY AND THE GREEN NETWORK
EN13: MAJOR LANDSCAPE FEATURES AND AREAS OF OUTSTANDING NATURAL BEAUTY
EN14: TREES, HEDGES AND WOODLAND
EN15: AIR QUALITY
EN16: POLLUTION AND WATER RESOURCES
EN17: NOISE GENERATING EQUIPMENT

EN18: FLOODING AND DRAINAGE
H1: PROVISION OF HOUSING
H2: DENSITY AND MIX
H3: AFFORDABLE HOUSING
H5: STANDARDS FOR NEW HOUSING
H6: ACCOMMODATION FOR VULNERABLE PEOPLE
H10: PRIVATE AND COMMUNAL OUTDOOR SPACE
TR1: ACHIEVING THE TRANSPORT STRATEGY
TR2: MAJOR TRANSPORT PROJECTS
TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS
TR4: CYCLE ROUTES AND FACILITIES
TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING
OU1: NEW AND EXISTING COMMUNITY FACILITIES
CA2: CAVERSHAM PARK

Supplementary Planning Documents

- Affordable Housing (2021)
- Sustainable Design and Construction (2019)
- Parking Standards and Design (2011)
- Employment, Skills and Training (2013)
- Planning Obligations under S.106 (2015)

Other Reading Borough Council Documents:

- Reading Tree Strategy 2021
- Strategic Housing Market Assessment (2016)
- Culture and Heritage Strategy 2015-2030
- Local Transport Plan 2011-2026
- Climate Emergency Strategy 2020-25
- Local Cycling and Walking Infrastructure Plan 2020-2030

National Planning Policy and Guidance

- National Planning Policy Framework
- National Planning Practice Guidance
- National Design Guide
- Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning:2 (Historic England, 2015)
- Statements of Heritage Significance: Historic England Advice Note 12 (2019)

EIA

At this early stage it is assumed that the proposals should be subject to Screening under the Environmental Impact Assessment Regulations 2017. Any significant environmental effects will be screened through this and this will require input from relevant consultees in order to assist the LPA in issuing a Screening Opinion and deciding whether an Environmental Impact Assessment is required. It is considered that the development proposals and the nature of the site raises a number of possible relevant matters including heritage, landscape, heritage, loss of habitat etc.

Land Use
The existing (lawful) use of the site is likely to be a *sui generis* use given the specialist nature of the BBC Monitoring use and the range of different functions associated with it.

Local plan Policy CA2 'Caversham Park' applies to the site. The policy describes the heritage and landscape sensitivities of the site and is clear that any new development should be limited to the conversion of the main house to residential, cultural, community or heritage uses. The policy does not allocate the site for additional development beyond conversion of the house but does acknowledge that there may be some scope for some limited development on previously developed land within the site. The policy sets criteria in respect of the impact on heritage assets, landscape impact and effect on trees and biodiversity. The policy is very clear that proposals should open as much of the park as possible to public access.

Heritage and Landscape
The effect of the proposals on the designated heritage assets will be a very important, consideration in the future development of the Caversham Park Site. Many areas fall under at least one designation, or form part of the setting of a designated heritage asset.

- The main house is Grade II listed under List Entry Number 1113560
- The inner park walls are Grade II listed under List Entry Number 1113561
- The Entrance Gates and Gate Piers are Grade II listed under List Entry Number 1113559
- The Temple to West of Caversham Park is Grade II listed under List Entry Number 1302853
- The Walls at Former Kitchen Garden at Caversham Park are Grade II Listed under List Entry Number 1302854
- Caversham Park is a Grade II listed Registered Park and Garden – List Entry Number 1000524
- It should be noted that a number of buildings, whilst not listed in their own right, are considered to be 'curtilage listed' due to their association with the listed main house, for instance numbers 1 and 3 Caversham Park Drive and possibly some buildings immediately to the west of the main house.

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the Local Planning Authority shall have 'special regard' to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest whichit possesses.

The NPPF 2021 includes Registered Parks and Gardens within the list of designated heritage assets and explains at paragraph 200 that substantial harm to or loss of Grade II listed buildings or Grade II registered parks and gardens should be exceptional.

Very limited detail on the proposals has been provided to date, however the following initial advice can be provided at this stage, based on the submitted layout drawing.

The proposals are likely to involve significant works to the main Caversham Park listed building as a result of the proposed conversion to multiple retirement dwellings. The proposed residential development within the grounds would also significantly alter the appearance and character of the parkland and will therefore affect the significance of the

Registered Park and Garden and also the setting of the various listed buildings referred to above.

A full Heritage Assessment including a detailed Assessment of Significance will be required. This should include an assessment of the heritage significance of the main house and its grounds, all other listed buildings within the site, together with an assessment of the heritagesignificance of the Registered Park. The Heritage Assessment should use this Assessment of Significance to develop a detailed assessment of the impacts of the proposals on all heritage assets both collectively and individually. Further guidance can be found at NPPG para 008 Reference ID: 18a-008-20190723 and Historic England document 'Historic Environment Good Practice Advice in Planning: 2'. It is clear from these that this sort of appraisal is neededearly in the design process to frame an appropriate design response and achieve an appropriate outcome.

A detailed Landscape Assessment will also be required and should sit alongside and be interwoven with the Heritage Assessment because the landscape in question (Registered Park and Garden) is a designated heritage asset. As part of this process it will be important to understand the original design intent and essential qualities of the garden. It is apparent for instance that the design includes formal areas but also more wild informal areas and that both perform their own function within the design of the parkland and the setting of the listed building. At this stage it should not be assumed that less formal areas towards the periphery are necessarily of lower heritage significance.

Proposals within the Registered Park boundary appear intent on maximising development on areas deemed to be 'previously developed land' as defined in the NPPF and referenced in Policy CA2. However it is not clear that all areas that are proposed do in fact fall under this definition, or to the extent suggested. This is particularly evident to the east of the site inthe field containing the existing satellite dishes. It is agreed that the footprint of the satellite dishes and the perimeter chainlink fence to each dish or bank of dishes could reasonably be described as previously developed land, however the character of the field remains distinctly undeveloped and the dishes appear as isolated features within this parkland setting. Given the heritage designations which apply to this land (the registeredpark and setting of listed building) it is considered that the extent of any curtilage to these structures should be drawn tightly around the individual pockets of developed land. Much of the space could also reasonably be described as undesignated open space and Policy EN8 would apply. As things stand it is considered that this largely undeveloped area should be treated as being for landscape enhancement to preserve the setting of the listed building and the special historic interest and openness of the registered park, rather than as a location for housing development.

Where development proposals are located on land which falls more comfortably within the previously developed land definition, even this in itself remains far from conclusive in establishing the acceptability of development. The impact on the special character of the landscape and the setting of listed buildings remains a primary consideration, as described in the criteria set out in Policy CA2. For instance, the car park to the north-east of the main house is more clearly previously-developed, however it remains a sensitive location, affectingthe setting of the front of the main house as well as being visually prominent within the historic parkland. It is acknowledged that the existing hard surface has limited aesthetic

qualities, however it exists as a two-dimensional and relatively unobtrusive feature whereas any new buildings on the car park land would have a very clear three dimensional form and the potential to disrupt the existing openness, obstruct views towards and from the listed building and across the parkland with consequent harm to its setting. Unless this issue is resolved, it would appear that the car park is not a plot for significant additional housing development.

The land to the western edge of the site fronting Peppard Rd is proposed to accommodate a new housing layout. This land falls outside the Registered Park and Garden designation although it should be assumed at this stage that it forms part of the heritage setting of the park and also that of the various listed/curtilage-listed buildings in the vicinity. Policies EN1 and EN6 are particularly relevant. The land is also considered to be 'undesignated open space' and Policy EN8 applies. The acceptability of the loss of this open space would be heavily dependent on the qualities of the remainder of the proposed development and particularly whether provision of suitably wide-ranging public access and improvements to recreational facilities are proposed in a way which outweighs the loss. Notwithstanding this point, it is important to mention at this stage that the proposed layout appears overdeveloped with what appears to be an uninspiring housing estate layout superimposed onto the plot with a focus on housing numbers rather than achieving high quality design. Subject to heritage and open space matters being satisfactorily resolved, it is apparent that much higher standard of design which reflects local distinctiveness would be required.Policies CC7 and H2 are particularly relevant alongside CA2, EN1, EN6 and EN8.

The proposed care home development adjacent to the western end of the Caversham Park house sits firmly within the setting of the Grade II listed building as well as being prominently sited within the Registered Park and within longer range historic views including the view described in Policy EN5. The plot in question is previously developed and currently contains a number of outbuildings, albeit at a much lower density and plot coverage. The status of these should be explored further as some may be curtilage listed, in which case there would be a higher bar in terms of justifying their demolition. It is noted that the proposals involve the removal of one visually prominent mature tree and extend close to other trees. Any replacement building would need to comply with the tests set out in Policy CA2 in respect of the impact on heritage significance, the character and appearance of the registered park and the effect on trees. Whilst some development would appear possible in this location it is not possible to comment further without the detailed heritage and landscape assessments referred to above and a suitable arboricultural impact assessment. These would need to be considered as part of the wider consultation exercise including input from heritage, tree and landscape advisors.

Policy EN5 identifies the view towards Caversham Park from the A329(M), railway and surrounding streets as being a 'significant view with heritage interest'. The Heritage Assessment and Landscape Assessment will need to address long range views such as this.

The site is likely to be of significant archaeological interest. Early engagement with Berkshire Archaeology (the Council's Archaeological advisers) will be necessary as part of further detailed pre-application discussions (Policies EN1 and EN2 apply).

It is not possible to comment on detailed design (appearance, layout, detailing etc) at this stage. Once the heritage, landscape, tree, ecology and open space constraints are clarified it will be necessary for any areas which are found to be capable of accommodating additional development to be subject to careful, high quality design, working within these constraints and informed by the character and local distinctiveness of the existing context as per Policy CC7. It is expected that this should be subject to independent design review, within the pre-application process. It will be necessary to be guided by Historic England in respect of the most suitable review approach (See NPPG Paragraph: 017 Reference ID: 26- 017-20191001).

Consultees most relevant to Heritage and Landscape at application stage will include: The Gardens Trust, Historic England, Berkshire Archaeology, the Council's Conservation and Urban Design Officer and the Council's Natural Environment Officer (Trees). It is noted that Historic England charge separately for pre-application advice, however the Council is aware that Historic England are willing to work together with the local authority at pre-application stage and it is apparent that any meaningful pre-application outcome will require close-working between RBC, Historic England and the applicant at pre-application stage. Fees may be payable separately but this should not affect the ability to work collectively.

Sources of heritage and historic landscape information to inform more detailed pre- application design work might include (but are not limited to):

- Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning:2 (Historic England, 2015)
- Statements of Heritage Significance: Historic England Advice Note 12 (2019)
- The various statutory list descriptions applicable to the site
- The Historic Environment Record
- Berkshire Records Office
- The Gardens Trust

Ecology

Policy CA2 refers to biodiversity as being a key matter to be addressed and this should be resolved at pre-application stage. The Council's Ecologist will need to advise on the detailed scope of any assessment as part of further detailed pre-application discussions. A suitable Ecological Assessment to demonstrate compliance with Policy EN12 will be required including more recent national policy requirements in respect of biodiversity net gain, (NPPF para. 174).

Trees

Policy CA2 highlights trees as an important matter to be addressed and again this should be worked through at pre-application stage. A detailed Tree Survey and Arboricultural Method Statement (to BS5837:2012) will be required and should form part of detailed preapplication discussions. Proposals for tree management to ensure their long-term health and longevity as part of the historic landscape should be included. The historic landscape designation and the

importance of trees to the parkland setting of the listed buildings means that the contribution that trees make within the landscape will be particularly important and the tree assessments should cross-reference and interrelate with the heritage and landscape assessments. Opportunities for additional tree planting to reinforce landscape character and provide succession planting as well as achieving the policy aims of extending tree canopy cover will be an important consideration. Integration of trees within sustainable drainage should also be considered. Policies EN14 and EN18 are particularly relevant and detailed advice is included in the Tree Strategy (2021) (https://www.reading.gov.uk/planning/trees/). A detailed landscaping scheme informed by the various assessments referred to above should be developed during the course of the pre-application proposal's development

Housing

Policy H3 requires 30% of new dwellings to be secured as Affordable Housing. The adopted Affordable Housing SPD (2021) sets out in more detail how this policy should be implemented. Affordable Housing is a high priority for the LPA and the Borough Council and it is expected that the 30% figure will be achieved. Any shortfall will need to be clearly justified and this should be set out at pre-application stage to reduce potential for delay at application stage. Paragraph 4.4.24 of the supporting text to the policy refers to such viability considerations and the limited circumstances within which a reduction might be appropriate if justified. There is a separate fee for assessment of viability submissions, as set out on the pre- application enquiry form.

Policy CR6 sets requirements for the bedroom mix that would be sought. There are wide ranging requirements for the design of new housing set out in the Local Plan, including those within Policies H5, H10 and CR6. It is expected that these would be explored further at detailed pre-application stage.

Public Access

Policy CA2 requires that as much of the park as possible should be opened-up to public access. Officers are aware that the presence of some historic Public Rights of Way are currently being considered by the Highway Authority. Regardless, it is apparent that the parkland throughout the site would lend itself well to public access. A scheme for public access, including provision of suitable access points, paths, landscape enhancements and other features which would benefit public access should be provided. Inclusive access for all potential users should be addressed as part of this scheme. It is expected that public access, and the nature of that access, will be secured through a S106 legal agreement. In general, where proposed uses conflict with the policy aim to provide public access it would be reasonable to conclude that those uses are not appropriate, and other uses, such as those referred to in Policy CA2 should be considered instead. Secure, gated accommodation is likelyto be in conflict with these policy aims.

Environmental Sustainability

The issue of environmental sustainability needs to be fully considered at detailed preapplication stage as it has implications for the design of the development and is likely to be closely related to landscape and heritage considerations. Policies CC2 and CC3 indicate an integrated design approach that maximises the opportunity for natural solutions wherever possible due to the multiple benefits associated with it. For instance, the use of tree

planting as part of a sustainable drainage system would offer benefits in terms of water storage, water quality, shading, and biodiversity as well as visual amenity (as opposed to relying on engineering or technical solutions such as attenuation tanks which offer fewer of these benefits).

Decentralised energy is a key requirement under Policy CC4. The Sustainable Design and Construction SPD provides further guidance on how this should be achieved with a sequential preference for Ground Source Heat Pumps instead of Air Source.

Various technical environmental standards apply and are set out in Policies CC2 and H5. This includes the requirement that all residential floorspace shall meet Zero Carbon standards, or to pay an offset amount for any shortfall.

Transport and Parking

Policy TR4 requires that existing cycle routes should be enhanced. Improvements and links to existing routes will be required together with improved facilities. It is noted that Routes R4 and R41 run around the site perimeter with Route 40 and National Route 5 close by to the west. There would appear to be an opportunity to provide routes within the site as part of the public access requirements of Policy CA2.

Policy TR1 seeks improvements for walking, cycling and public transport. A detailed Transport Assessment, including a full exploration of potential improvements will be required to be developed during the detailed pre-application stage. It is expected that this will integrate with landscaping, heritage to achieve high quality design.

Policies TR3 and TR5 apply in respect of parking, together with guidance in the Parking Standards and Design SPD. The Transport Assessment will need to demonstrate that the development would provide car and cycle parking that is appropriate to the accessibility of the site. Provision of car club vehicles is also an important consideration and may fit wellwith an assisted living model.

S106 Obligations and CIL

S106 obligations are likely to be extensive for a scheme of this nature and should be explored more fully as part of the detailed pre-application process. Securing Affordable Housing, the areas and nature of public access, controls on the nature of the use (including retirement and institutional uses) etc are immediately apparent.

CIL will be chargeable in accordance with the Council's Charging Schedule, available on the Council's website.

Community Engagement

Community engagement is an important component of high-profile schemes such as this. NPPG advice at Paragraph: 019 Reference ID: 26-019-20191001 encourages early and inclusive engagement and the Council's adopted Statement of Community Involvement sets out the expectations for this. https://images.reading.gov.uk/2019/12/Statement-Of-Community-Involvement-Mar14.pdf. It is considered that this scheme would be one of the more "significant or sensitive proposals" referred to on page 15 of the SCI. The Council will assist in scoping this work, but it is recommended that the developer should prepare an initial

project plan for community engagement for discussion at early stage in the detailed pre-application process, to include, but not limited to:

- Local residents – there is likely to be wide interest across Emmer Green and Caversham
- Reading Civic Society
- Local interest groups including Caversham and District Residents' Association, Emmer Green Residents' Association, Caversham GLOBE, Keep Emmer Green.
- Any sports clubs (etc) currently using the site.

Further persons and groups for engagement may become apparent as pre-application work progresses and consultees are involved in the process.

Scope of Pre-application Enquiry and Application

It is considered that the following studies/reports would be required in support of the Applications (applications for full planning permission and Listed Building Consent are required) and it is advisable that these are produced and assessed as part of detailed pre-application discussions to improve certainty during the formal application process.

This list is not necessarily exhaustive and may be added to or amended as detailed preapplication discussions progress. Please also refer to the Council's Validation Checklist,and 2021 Consultation Draft Validation Checklist on the Council's website.

- EIA Screening, and subject to the outcome potentially Scoping and subsequent Environmental Statement.
- Heritage Assessment including detailed surveys, large scale drawings, schedules of works for listed buildings etc.
- Landscape Assessment, including short, medium and long range views with particular reference to heritage sensitivities.
- Archaeological Assessment
- Transport Assessment
- Daylight/Sunlight Assessment
- Air Quality Assessment
- Noise Assessment
- Affordable Housing Statement
- Financial Viability Assessment (where less than 30% Affordable Housing is to be proposed).
- Sustainable Drainage Proposals
- Initial Contaminated Land Assessment (including land gas)
- Tree Survey and Arboricultural Impact Assessment
- Ecological Assessment, including mitigation and enhancements
- Landscaping Proposals
- Energy Statement
- Flood Risk Assessment
- Security Strategy
- Public Access Strategy

It is expected that detailed existing (including topographical survey) and proposal drawings would be submitted during the course of the detailed pre-application process, culminating in a full set of drawings for final comment at the end of the process and prior to a planning application being submitted. The aim being to resolve as many areas of concern at pre-application stage prior to formal applications being submitted.

Consultees

The following are considered to be relevant consultees (the Council reserves the right to add or amend this list). Given the confidential nature of pre-application discussions, the applicant will need to confirm that they accept external consultees being involved in the pre-application process. It may not be necessary/appropriate to involve all consultees at pre-application stage and this can be reviewed at the start of detailed pre-application discussions:

- Design South East/Design Council CABE (Design Review, to be arranged at an early stage as a bespoke service to be procured from DSE/Design Council) – subject to Historic England advice.
- Third party daylight/sunlight consultant (to be agreed – instructed by and reporting to the LPA but funded by developer)
- Historic England (charge for pre-application advice separately but it is expected that the Council and HE would work collaboratively on detailed pre-application advice.
- The Gardens Trust (formerly the Garden History Society).
- Natural England (at application stage, if EIA development)
- Environment Agency (the developer is advised to apply directly to the EA for preapplication advice as they charge separately).
- National Planning Casework Unit (at application stage, if an EIA Development)
- Berkshire Archaeology
- Thames Valley Police (Designing Out Crime Officer, CCTV)
- Royal Berkshire Fire and Rescue Service
- South Central Ambulance Service
- Southern Gas Networks
- Scottish and Southern Electricity
- Thames Water
- Adjoining Local Authorities
- Clinical Commissioning Group (NHS – doctor surgery capacity etc)
- RBC Ecologist
- RBC Natural Environment (Tree Officer)
- RBC Environmental Protection (EHO)
- RBC Housing Strategy (Affordable Housing)
- RBC Transport (Highway Authority)
- RBC Emergency Planner
- RBC Education (school capacity planning)
- RBC Leisure Service
- RBC Building Control
- RBC Access Officer (inclusive access)
- RBC Cultural Development Officer
- RBC Waste Operations (refuse storage/collection)
- RBC Valuation (to assess any submitted viability assessment (charged separately as per pre-application form)
- RBC Sustainability Manager (particularly in respect of decentralised energy but also wider environmental sustainability).

Conclusion

The proposals are at an early stage of their development and raise a wide range of issues and matters to be resolved due to the highly-sensitive nature of the site which includes listed

buildings and their settings, the Registered park and garden, sensitive/long-distance views, important trees, matters relating to protection of open space and ecological considerations.

Policy CA2 gives a clear steer for future development and sets out the expectation that the main focus for development will be the main house, involving its sensitive conversion to a use compatible with its heritage significance. A detailed Heritage Assessment is required, but subject to this, it would appear that a heritage-led conversion to some form of retirement living apartments would be a reasonable approach, worthy of further consideration as part of detailed pre-application discussions.

Other areas of the site are heavily constrained in terms of their scope for development:

- The construction of a care home (Class C2) immediately to the west of the main house would be on previously developed land but is in a highly sensitive heritage context adjacent to the listed building and within the registered park. Whilst some new development may be appropriate this remains heavily dependent on the findings of the heritage and landscape assessments referred to in this response and the LPA's appraisal of these, drawing upon the advice of relevant experts. It is reasonable to expect that any structure resulting from this process would need to be subservient to the main house in scale and appearance.

- The construction of a row of townhouses in place of the existing car park to the north east of the main house is problematic in terms of the effect on the special character of the registered park and the setting of the listed building. Any development in this location would be dependant on the findings of acceptable heritage and landscape assessments and the need to achieve high quality design within the context of scope for development plots which may emerge from these assessments, to be agreed by the LPA. At this stage it is not certain that any significant development in this location would be acceptable, although there may be scope for further investigation and discussion as part of the pre-application process.

- The opportunity for the construction of a group of houses and flats (C3) within the clearing currently occupied by satellite dishes to the east of the main house is far from clearly established. The land is historically undeveloped (not PDL), prominently sited within the registered park and garden, forms a key element of the setting of the listed house and is considered to be open space in policy terms. Further exploration of this element of the proposals is discouraged.

- Construction of a group of houses in the enclosed field to the north of the BBC Records Centre, fronting Peppard Road and to the south of Caversham Park Drive would lie outside the Registered park and garden boundary although it would remain within the setting of this heritage asset and also the setting of listed buildings in the vicinity. The land is not previously developed and is considered to be undesignated open space (Policy EN8). Some development of this land for housing could be explored further subject to the criteria set out in Policy EN8, especially when balanced against wide-ranging access rights to the remainderof the parkland. Any design would need to be high quality, preserve the setting of heritage assets, and enhance local character and distinctiveness. The housing layout currently proposed does not appear to achieve these requirements and would not be supported. A significant amount of further pre-application work is required.

- Change of use of numbers 1 and 3 Caversham Park Drive to two C3 dwellinghouses and associated works is likely to be acceptable, subject to detailed design.

There is clear potential for public access throughout most of the site as per Policy CA2. A strategy for this should be developed during further pre-application discussions.

It is expected that this initial response will be used to inform a full, detailed, pre-application process as the next stage prior to making an application for full planning permission. It is apparent from this response that the proposals are not supportable in their current form, although there are areas that merit further exploration at pre-application stage. The proposals are not ready to submit formally and there remain wide ranging and complicated matters to be addressed.

This response is provided as an initial scoping of the immediately apparent Planning issues raised by the proposal and without the benefit of public consultation or engagement, or consultee input. These are important elements of the planning process which cannot be circumvented, and which may indicate a different outcome in due course.

Please note that the advice contained within this letter, or attached report, is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council in the event of a formal application for planning permission being submitted.

Yours sincerely

SDV
Steve Vigar
Principal Planning Officer

Frances Martin
Executive Director for Economic Growth and Neighbourhood Services

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11 February 2022

Without Prejudice

Your contact is: Steve Vigar, Planning

Dear Mr Brown,

PRE PLANNING APPLICATION ENQUIRY RESPONSE NOTE 1

Enquiry Reference: 211685
Address: Caversham Park, Peppard Road, Caversham, Reading, RG4 8TZ

This note follows on from and builds upon the initial advice which we provided on 5 November last year and is based on the drawings which you provided on 13 January and the Heritage and Landscape note dated 31 January. The main focus of this response is the heritage and urban design aspects of the proposal, excluding the main house which we will address separately. It is intended to be read in conjunction with the attached Historic England advice. This response is certainly not exhaustive and is intended to guide further pre-application discussions, which are ongoing.

Care Home
The replacement building appears too large for the location and would disrupt the ordering of primary and secondary elements of the building as identified by Historic England in their response. Currently the courtyard buildings are of a suitably diminutive scale. The proposed care home would represent a significant increase in scale relative to the part of the original building adjacent and would also extend forward of the building line of the main house. This would appear to result in an overlarge extension to one end – unbalancing the current ordering of building elements. This uncharacteristic addition would erode the quality of the important east-west view across the frontage towards and from the temple. The care home would also appear to encroach visually and physically upon the woodland, in addition to potential arboricultural concerns, this would appear to be an unnecessary and harmful encroachment into the parkland setting. A smaller care home with a single wing on an east-

west axis and set back relative to the plane of the front and rear elevations of the main house and not encroaching on woodland to the west may be appropriate.

Field to North of BBC Records Centre (west end of site fronting Peppard Rd)
It is likely that some loss of open space can be justified in this location in general terms but only if sufficient areas of parkland are opened up to public access through the application. Whilst this part of the site falls outside the RPG it is far from easily developable. It forms part of the setting of the listed structures at the park entrance – gates, lodge and bursars house – and the setting of the RPG itself (see HE advice letter). It remains governed by the comprehensive Policy CC7 which sets a range of criteria – largely focused on preserving and enhancing existing local character. Our initial pre-app advice still applies: "*…appears to be an uninspiring housing estate layout superimposed onto the plot with a focus on housing numbers rather than achieving high quality design. Subject to heritage and open space matters being satisfactorily resolved, it is apparent that much higher standard of design which reflects local distinctiveness would be required. Policies CC7 and H2 are particularly relevant alongside CA2, EN1, EN6 and EN8.*"

The built environment on Peppard Road is distinctively low density in character with spacious plots and a distinct building line with good sized frontages. This, is reinforced by the parkland to the north and east. The BBC Records Centre, whilst large, remains quite recessive due to its set back position relative to the road and low roofline. The field itself is open and has a distinctly open vegetated character. Taken together the character of the area can reasonably be described as being developed at a low density and possessing a spacious verdant quality. Any development of this field would need to preserve and enhance this existing character. The proposed buildings adjacent Peppard Road appear particularly harmful with a wholly uncharacteristic arrangement immediately adjacent to the road and with flank walls fronting the street. The layout would appear obtrusive in the street scene and would relate very poorly to the street in layout terms. Any buildings provided in this space would need to maintain the open landscaped character to the street and should be informed by existing set backs – e.g. the Records Centre and the Lodge. The 3 storey block of flats at Plots 26-33 would be a wholly unacceptable in this context.

The proposed housing layout lacks form and definition and appears as a somewhat jumbled arrangement of buildings, parking courts and poorly-defined landscaped spaces. A complete re-working is required with a more low-density design-led approach which celebrates the landscaped setting and which has proper regard to the existing built environment.

The need to preserve the open character of the Peppard Road frontage, together with the findings of Historic England in requiring development to keep clear of the RPG boundary in order to preserve its setting does suggest a significant constraint on development. A low density, landscape-driven design should be explored.

Pavilion
The extension is quite large relative to the existing structure – but would be on existing hardstanding and single storey. I would expect the justification for this to be heavily bound up with the extent of public access and the community benefits associated with it.

Eastern Buildings – Plots 1-12 – Car Park site
As per Historic England advice, the current proposals would intrude into an area that is currently open and would disrupt the historic driveway layout and the spacious, natural setting of the mansion. This would result in substantial harm to the character and appearance of the RPG and the setting of listed main house.

Eastern Buildings – **Satellite Field**
In general – this does contain some limited development in the form of satellite dishes but retains an open verdant character. The initial pre-app response advised the following:
"the field remains distinctly undeveloped and the dishes appear as isolated features within this parkland setting. Given the heritage designations which apply to this land (the registered park and setting of listed building) it is considered that the extent of any curtilage to these structures should be drawn tightly around the individual pockets of developed land. Much of the space could also reasonably be described as undesignated open space and Policy EN8 would apply. As things stand it is considered that this largely undeveloped area should be treated as being for landscape enhancement to preserve the setting of the listed building and the special historic interest and openness of the registered park, rather than as a location for housing development."

As per HE advice, the proposed housing within the former satellite woodland site would harm the fundamental purpose of the country house to be set isolated within a parkland setting.

Notwithstanding this fundamental concern, I would make the following comments. Plots 45-53 are proposed to be a three storey block of flats with a large roof. This would have a particularly bulky form, wholly inappropriate in the context and would appear very close to main house both views out from the house to the east and views towards the house from the north, south and east. The other plots appear to take the form of a nondescript modern housing estate layout which would add further harm to the character of the RPG and setting of the main house.

There may be some limited scope for an entirely different approach, perhaps scattered dwellings set within parkland setting. It is quite clearly not a suitabl site for a suburban housing layout in what is a sensitive heritage context.

Lodge Building (incorrectly labelled Bursars House on plans)
Limited intervention – appears reasonable.

School House and Bursars House (incorrectly labelled Gate House on plans)
Limited external changes – new doorways to rear. Significant changes internally – loss of staircases, new stairs and numerous new partitions to create four dwellings. The main significance appears to be external appearance. The Council's Conservation Officer may have some further detailed advice to offer in due course.

To conclude, the site is notable for its heritage significance and heritage matters are considered to be of primary importance in Planning terms. Based on the current proposals, and the information currently available, it is apparent that the scale and extent of the proposed development must be significantly scaled to in order to be acceptable. A more

detailed examination of the wider Planning issues would be more worthwhile once the scheme has been reduced to within more acceptable parameters.

As with the initial response, the advice contained within this letter, or attached report, is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council in the event of a formal application for planning permission.

Yours sincerely

SDV
Steve Vigar
Principal Planning Officer

Appendix 4 : Historic England’s pre-application response 10 February 2022 - Reference PA01107126

Historic England

Mr Jason Clemons
By email only

Direct Dial: 0207 973 3700

Our ref: PA01107126

10th February 2022

Dear Mr Clemons,

Pre-application advice

Caversham Park, Caversham

Further to our recent meeting, we have the following advice to offer on the proposed redevelopment of the site at Caversham Park.

Historic England Advice

Significance of Caversham Park house and grounds

The site of an historic house (later 17th century) with associated deer park replaced by successive houses or phases of remodelling firstly in the early 18th century, rebuilt after fire in the 1770s, and finally rebuilt again in the 1850s after another fire. The surrounding landscape was likewise designed and redesigned to provide a suitably impressive and tasteful setting to the house and as a place of interest and delight in its own regard for the residents and their visitors. The elevated position chosen for the house naturally affords the ability to take in views to the south (together with careful management of trees) and can be seen from the railway line running through Reading. The focus of the existing house is predominantly to the south with an elaborate High Renaissance-style façade and flanking colonnades, all addressing the long 17th century terrace and sweeping views towards Reading. The north elevation is more restrained but with elegant detailing and a port cochere to receive visitors who would pass through the grand gateways, past the lodge house and arrive along the sweeping driveway. It is interesting to note that the existing house is understood to have been constructed around an iron frame which is a novel approach for a residential building using technology well-used in an industrial setting. The interior of the house, despite some modifications through the 20th century, retains numerous decorative rooms and architectural features through the house that illustrate the

tastes and fashions of the wealthy in the mid-19th century. The modifications for the BBC monitoring service use of the building, although of no architectural value, are of some interest for their facilitation of the BBC's operations.

The grounds of the house, despite considerable contraction over the 20th century, retain a clear and important designed landscape character as a parkland with gardens. The grounds date from numerous periods and incorporates different designed elements that as a whole achieves a varied, interesting and predominantly green and natural appearance. Modest garden structures have also been a feature of the garden. The parkland and garden are also a key contributor to the significance of the main house because a country dwelling of this status would always be set within grand and impressive grounds.

Impact of the proposals - The carpark site and satellite woodland site

The proposals are for the demolition of the western extension built for the Oratory School and redevelopment and conversion of the house to assisted living apartments, a new 2-storey care home to the west of the house and new houses to the east and north east of the house. Housing outside the boundary of the registered park and garden is also proposed. Recreational facilities are proposed on the open area north of the house and car parking is proposed north and south along the driveway near to the main house.

We consider that the proposals are likely to cause a high level of harm to the registered park and garden and the significance of the house. In particular, the proposed terraced row to the north east of the house (on the current car parking area/ Plots 1-12) and those to the east in the former satellite woodland site.

The former sweeping driveway that runs north of the house that is now a car park remains open and unencumbered by built form. Despite the presence of a carpark, the sinuous shape of the driveway is still present in the landscape and the surrounding vegetation (largely fairly young vegetation) responds to this. The proposal to build housing on this area of the site would permanently remove the historic open driveway character of this area of the park and irrevocably damage the sweeping route to the north of the house, causing a high level of harm to the registered park and garden. Furthermore, situating a row of terraced houses within close visual proximity of a formerly rural mansion will fundamentally undermine the understanding and experience of what a house like this aimed for; to be away from urban areas and other people and to be living in a beautiful specious house surrounded by beautiful spacious, natural grounds.

Likewise, the proposed housing within the former satellite woodland site would similarly harm the fundamental purpose of the country house to be set within splendid isolation. In addition, the design feature of these wooded areas at the end of the terrace appear to have been designed with pathways through them around the outer areas to allow for exploration. The early 19th century maps suggest that the wooded area to the east acted as an enclosed area at the end of the terrace, beyond which the landscape opened out onto open grassland dotted with trees and a rolling

view east and south east. The enclosed and treed nature of the eastern wooded area is an important historic design feature. Despite the considerable change to the character of the landscape beyond the boundary of the site, if this area were developed in the manner proposed it would cause a high level of harm to the registered park and garden through the permanent change to this naturalistic feature.

Other areas of the proposed scheme

Proposed new car parking to the north of the house would also cause harm through unsympathetic change in appearance of the sweeping driveway and further erosion of parkland. It would also exacerbate an existing unsympathetic setting the listed house.

The position of the proposed care home extension together with its proposed large scale would also, as currently proposed, cause harm to the house and garden. It is likely to appear quite visible along the terrace walk and from the temple which would harm the experience of these historical landscape features. It will also appear as a very large building and would disrupt the hierarchy of the historic house as the largest, principal building followed by smaller wings and ancillary structures. It should be amended to sit well back behind the southern building line of the main house. The overall visual impact should be no greater than the building that exists and the scale should be amended to achieve this. Further detail showing elevations and the likely appearance of this building would be welcomed.

Furthermore, housing proposed outside the boundary of the parkland is also likely to cause a degree of harm to the significance of the registered park, particularly where it is proposed to sit hard up the boundary as it will be visible within the context of the lodge and driveway. We recommend that housing is removed from locations adjacent to and within proximity of the boundary, and development is only located further to the west. Furthermore, the designs for the layout and dwellings/ buildings should be suitably sensitive to the nearby heritage assets of the lodge, gates and registered park and garden.

Conversion of the house and benefits of the scheme

The conversion of the house, however, if carefully detailed would be likely to only cause some limited harm. And we also accept that the recreational needs of residents should be accommodated and the provision of bowling laws within the open flat area to the north of the drive would be a suitable place for this given the current open, flat and green nature of the site.

Other areas of potential improvements and heritage benefit includes the current surfacing of the driveway and carpark which is not sympathetic but could easily be improved be removing the tarmac reinstating a suitably surfaced driveway. This would provide an enhanced setting to the house and improve the character and appearance of the registered park and garden.

Relevant planning policy

Reading's Local Plan Policy CA2 sets out that the conversion of the main building will be acceptable if it sustains the significance of the listed building, and that proposals should open as much of the park as possible to public access and reinstate historic pathways. The policy is also clear that the site is not allocated for additional development, with the possibility for some limited development on previously developed land. Development of this nature will need to be justified. To ensure that the important heritage assets at the site are conserved the policy outline criteria that proposals must comply with, including no development negatively affecting significance and setting, and development not detracting from the character and appearance of the important landscape. The protection of significant trees is also outlined in this policy.

The NPPF sets out paragraph 199 that great weight should be given to the conservation of designated heritage assets, and that any harm to the significance of those assets should require clear and convincing justification (paragraph 200). Where harm would be caused and where clear justification is set out, the harm should be weighed against the public benefits of the proposals as set out at paragraph 202. Finally, paragraph 206 sets out new opportunities to enhance or better reveal the significance of heritage assets should be sought.

Conclusions about the scheme

Based on the pre-application information we have seen, should an application be submitted for the proposals in their current form we anticipate that we would object strongly to the scheme because of the harm the proposals would cause to the significance of the listed house and the registered park and garden, the lack of clear and robust justification for the harm and the lack of meaningful enhancement to heritage assets incorporated into the scheme.

As set out above, the conversion of the main house and replacement of the extension to the west are likely to be achievable, subject to further refinements. It may also be possible to develop outside the boundary of the registered park, although this area requires considerable redesign. However, based on our current assessment of the site and the nature of the proposals we see little prospect of finding a workable solution to the proposed development of the existing carpark, nor the intensity of development within the former satellite woodland. We therefore encourage that these latter elements are removed from the proposals.

We would wish to continue offering advice on refinements to the designs where this would be helpful.

Yours sincerely,

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